



Cookies Policy

INTRODUCTION

The purpose of this policy is to provide requirements for cookie usage and establish the steps that the IT department should follow to implement, support, and use cookies from the company's web page. These requirements must be followed as documented in order to protect company systems and data from unauthorized access or misuse.

As being a regulated broker, CloackX Ltd (hereafter for short 'CLKX' and 'company') would like its potential and present clients to rest assured that any personal information we collect, through any means, will not be shared with third-parties. Please read our Privacy policy for more detailed information on how we use your data. If you have further questions please do not hesitate to Contact us. This Policy is based on the categorization of cookies, their functions and what they are used for.

It is important that the Policy is punctually implemented and the website is in an utter alliance with it. The respective IT department shall use the Policy as a guide consistently and properly, in particular by not miscataloging or mis-describing cookies. This guide is therefore a useful tool to aid compliance.

WHY WE USE COOKIES?

We use cookies to analyse visitor data, which would allow us to improve our website by ensuring its optimal functionality and measure advertising performance. Cookies allow us to tailor our content to your personal preferences and so provide a better website experience.

COOKIES EXPLAINED

Cookies are small pieces of information that are stored on your computer by a website you visit in order to enable you to perform certain functions on the website and regulate its content to your preference. They can store data on pages which you have provided key information for (e.g. when you provide a password) but only once you are asked and you accept the storage of this information. Cookies may be



used on some pages of the site for us to provide website users with a more customized web browsing experience; they are not used to determine the personal identity of anyone merely visiting the site.

As per the purpose of collection, initially four cookie categories have been identified:

- Strictly necessary cookies
- performance cookies (statistic / analytical cookies);
- functionality cookies (preferences cookies); and
- marketing cookies (targeting/advertising cookies).

Based on their provenance, can be distinguished two categories of cookies:

- First-party cookies — these cookies are placed on your device directly by the website you are visiting;
- Third-party cookies — these cookies originate not from the website you are visiting, but – as the name implies – from a third party like an advertiser or an analytic system.

Based on their lifetime, there are two types of cookies: session cookies and persistent cookies.

- Session cookies are created temporarily in the user's browser's subfolder while the user is visiting a website. Once a user leaves the site, i.e. closes the browser, the session cookie is deleted, therefore, session cookies do not have an expiration date. Session cookies are used to retain the information you provide us with as you navigate through each section of our website. You can choose to decline session cookies via your browser's privacy settings but please note that this may have a negative impact on your browsing experience and particularly if these are declined across all websites.
- Persistent cookies have a clearly defined expiration timeframe written within their code. Cookie files remain in the browser's subfolder and (unless deleted by the user) get activated again once the user visits the website that created that particular cookie. A persistent cookie remains in the browser's subfolder for the duration period set within the cookie's file, which, according to the ePrivacy Directive, should not last longer than 12 months if not being deleted by this time from the user.



Cookie files are automatically lodged into the cookie file – the memory of the browser and each one typically contains:

- The name of the server the cookie was sent from
- The lifetime of the cookie
- A value – usually a randomly generated unique number

The website server which sent the cookie uses this number to recognize the user when he returns to a site or browse from page to page. Only the server that sent a cookie can read, and therefore use, that cookie.

WHAT KIND OF COOKIES WE USE

Strictly Necessary cookies

Strictly necessary cookies are essential for the website to provide basic functions or to access particular features of it, without which the site would not work. This type of cookie does not collect any personally identifiable information about you and does not track your browsing habits.

Strictly necessary cookies do not require user consent as per the provisions of the Data Protection Act (DPA), which allow essential cookies to be exempt from collecting user consent before performing their actions.

Performance cookies

Performance cookies, also known as statistics and analytical cookies, may include both temporary and more persistent cookies that we use to track how you use our website and for how long. None of this information can be used to identify you. It is all aggregated and, therefore, anonymized. The analytical cookies help us improve how we provide you with our content.

You can choose to opt out from the collection or use of your data for this purpose.

Functional cookies

Functional cookies, also known as preferences cookies, allow the website to remember, record and save your choices made while browsing the website, in order to provide for a more seamless experience across our website. One way functional cookies do this is by remembering your language selection each time you visit us.



You can choose to opt out from the collection or use of your data for this purpose.

Marketing cookies

These cookies track your online activity to help advertisers deliver more relevant advertising and can be shared with other parties like Google+, Facebook or YouTube. These cookies allow us to offer you easy ways to share our content throughout your social media and also present you with the videos we post on YouTube. You can choose to opt out from the collection or use of your data for this purpose.

COOKIES AND DPA

As far as cookies are used to identify users, they qualify as personal data and are therefore subject to the DPA. Companies do have a right to process their users' data as long as they receive consent or if they have a legitimate interest to do so.

The company processes personal data in order to carry out tasks related to its business activities, on the ground of a legitimate interest and ensuring that the rights and freedoms of the individuals are not seriously impacted. Legitimate interest is in place when the processing takes place within a client relationship, when it processes personal data for direct marketing purposes, to prevent fraud or to ensure the network and information security of your IT systems.

The Company documents and stores all consents received from the users. The Company allows users to access its service even if they refuse to allow the use of certain cookies.

The Company obtains your consent before usage of any cookies except for strictly necessary cookies.

In case you have not visited the website for 30 (thirty) days, you will be asked to provide your consent again.

You can withdraw or modify your cookie preferences by clicking on the Cookie settings on the website's footer.

