

COOKIE POLICY

DEFINITIONS

1. **Controller** – DeltaWise OÜ, with its registered office in Tallinn (Republic of Estonia), registered under Estonian law in the Tartu County Court Registration Department under number 12922325, registered address: Narva mnt 7, Keskklinna district, Tallinn city, Harju county, 10117, Estonia.
2. **ePrivacy Directive** – Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications).
3. **Cookies** – files containing data, stored by the web browser on the User's device, for the purpose of retaining information used for identification or remembering the history of actions taken by the User when using the Service.
4. **Policy** – this Cookie Policy and the Privacy Policy.
5. **GDPR** – Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
6. **Device Recognition** – consists of applying operations based on statistics and probability to analyze collected information about the User's device (information about the browser, operating system, installed plug-ins, time zone, screen size, system fonts, and other configurations) and assigning a common identifier to the data resulting from the use of the device. The purpose of this activity is to attempt to recognize the User (e.g., identifying that the Client is the same User operating multiple devices). This information is used for accurate User identification.
7. **Service** – the system of websites made available under the domain www.deltawise.eu.
8. **Website** – a single resource or subpage forming part of the Service, available under a specific URL within the domain www.deltawise.eu. The Website may contain informational content, graphic elements, and links to other subpages of the Service and documents.
9. **User** – a person visiting the Controller's Service.

TYPES OF COOKIES USED

1. Based on the provisions of GDPR, the ePrivacy Directive, and national law, the Controller informs that it uses and stores Cookies. Information on this matter is included in the Policy and in the Service.
2. Cookies operate in such a way that, while using the Website, small fragments of data are stored by the browser on the User's device, and the Controller may have access to them. During subsequent visits, the browser sends this data back to the Service, which enables Device Recognition and maintaining settings or sessions, for example by generating a session identifier and sending it again.
3. The Controller collects and uses Cookies performing various functions within the Service. The following categories of Cookies used can be distinguished:
 - a. necessary (technical) – enable the operation of basic functions of the Service, such as navigation and access to secure areas of the Service; the Service cannot function properly without these Cookies;
 - b. functional – allow remembering information that changes the appearance or operation of the Service, e.g., preferred language or region where the User is located;

- c. analytical – help the Controller understand how Users use the Service by collecting and reporting anonymous information about visitors, bounce rate, traffic source, etc.;
- d. advertising – may track the User's activity within the Service; they are used to deliver relevant advertisements and marketing campaigns to visitors;
- e. unclassified – these are Cookies that are in the process of being classified in cooperation with providers of specific technologies.

4. Within the Service, the Controller distinguishes two types of Cookies based on their storage duration:

- a. session Cookies – are stored on the User's device until the end of the given browser session and are automatically deleted after the browser is closed;
- b. persistent Cookies – are stored on the User's device for the time specified in the parameters of the Cookies or until they are manually deleted by the User.

PURPOSE OF USING COOKIES

- 1. Cookies collect information regarding how Users use the Service and are intended to increase the availability of services and improve their quality. Data collected in this way is used by the Controller mainly for statistical purposes, as well as for analyzing User activity on Websites that are part of the Service.
- 2. Cookies do not contain information that enables direct identification of the User and, as a rule, are not intended for processing the User's personal data.
- 3. The Controller uses its own Cookies to ensure the convenience of using the Service by the User, including limiting the number of notifications displayed, e.g., regarding possible updates of content posted in the Service and the use of Cookies. Cookies used by the Controller also serve to maintain the security of the Service and to optimize the User's use of the Service, e.g., by remembering the User's preferences (necessary, functional, and analytical Cookies).
- 4. The Controller may also use third-party Cookies (e.g., Google Analytics, Google Analytics 360) to count visits to the Service and individual Websites within it, the duration of those visits, and to determine which functionalities of the Service or its parts were most frequently used or visited. Information collected in this way allows the Controller to analyze performance and define directions for the development of new functionalities and services offered through the Service (analytical Cookies).
- 5. The Controller also uses its own Cookies to identify the User for the purpose of analyzing activity within the Service, determining which actions the User performed on the Service's Websites, in particular which information was displayed (analytical Cookies).
- 6. The Controller's Cookies and third-party Cookies (e.g., Google Ads) are used to conduct marketing campaigns and remarketing campaigns that reach the client with marketing messages if they previously visited the Controller's Service. Cookies remember that the client visited the Service and what activities were performed. Information collected in this way may be shared with third-party providers. Third-party Cookies are also used to send notifications to the client's browser (so-called web push notifications).
- 7. Cookies may be used by the Controller and entities cooperating with the Controller, as well as partners and advertisers such as Facebook, Google.
- 8. Entities cooperating with the Controller, partners, and advertisers use Cookies for the following purposes:
 - a. collecting information on the number of Users using the Service, how they use the Service, where they come from, and which pages they visit most frequently;
 - b. tailoring advertising content to the individual needs and interests of the User;



c. determining which websites the User visited during a given browser session.

MANAGING COOKIES

1. The User may define the conditions for storing or accessing Cookies through browser settings or service configuration. Information on managing Cookies – including rejecting the storage of new ones, deleting previously stored ones, receiving notifications about new Cookies, and blocking the operation of Cookies – can be found in the browser settings, usually in the privacy or security section. Detailed instructions are available in the help documentation of the respective browser.
2. To ensure the highest quality of the Service, the Controller informs that changing Cookie settings, including rejecting the storage of Cookies, may cause difficulties, limitations, or even prevent the User from using certain services offered by the Controller or its partners.
3. Most web browsers are set by default to allow Cookies to be stored on the User's end device. If the User does not consent to the use of Cookies, they may change their browser settings at any time by blocking or disabling Cookies stored on the User's end device. Otherwise, the User consents to the use of Cookies in accordance with applicable legal provisions.
4. For transparency and ease of use of the Controller's Service, the User has the option to change Cookie settings directly in the panel displayed at the bottom of the Website of the Service.

LIST OF COOKIES USED

The Controller provides detailed information on the types of Cookies used within the Service, including the purpose of using Cookies, as well as the duration of their operation and the provider of the file.