

## **ANNEX 4: COOKIE POLICY**

Visiting and/or registering to our website [www.brightowl.pro](http://www.brightowl.pro) (also referred to as “BrightOwl Platform” or “Platform”) with your browser settings adjusted to accept cookies or other software tells us that you want to use our website and that you consent to our use of cookies as described below (also referred to as “Cookie Policy”).

Like most websites, we use technologies that are essentially small data files placed on your computer, tablet, mobile phone or other devices (refer to collectively as a “device”) that allow us to record certain pieces of information whenever you visit or interact with our website.

Cookies are small text files (typically made up of letters and numbers) placed in the memory of your browsers or device when you visit a website or view a message. Cookies allow a website to recognize a particular device or browser.

There are several types of cookies:

- Session cookies expire at the end of your browser session and allow us to link your action during that particular browser session.
- Persistent cookies are stored on your device in between browser sessions, allowing us to remember your preferences or actions.
- First-party cookies are set by the site you are visiting.
- Third-party cookies are set by a third party site separate from the site you are visiting.

Cookies can be disabled or removed by tools that are available in most commercial browsers. The preferences for each browser you use will need to be set separately and different browsers offer different functionality and options.

We offer certain site features that are available only through the use of cookies. You are always free to block, delete or disable these cookies if your browser so permits. However, if you decline cookies or other similar technologies, you may not be able to take advantage of certain site features. You may also be required to re-enter your password more frequently during your browser session.

Any personal information we collect and store through use of cookies is first obtained through notice and consent: We obtain your consent by providing you with transparent notice of the use of cookies.

Our use of cookies fall into the following general categories:

- **Operational Necessary:** We may use cookies that are necessary to the operation of our site. This includes cookies that allow you access to our site, that are required to identify irregular site behavior, prevent fraudulent activity and improve security, or that allow us to make use of our functions;
- **Performance Related.** We may use cookies to assess the performance of our website, including as part of our analytic practices, to help us understand how our visitors use our website;
- **Functionality Related.** We may use cookies that allow to offer you enhanced functionality when accessing or using our site. This may include identifying you when you sign into our site or keeping track of your specified preferences, interests or past items viewed so that we may enhance the presentation of content on our site;

- Advertising or targeting related. We may use first-party or third-party cookies, including ads relevant to your interest, on our site or on third party sites. This includes using cookies to understand the usefulness to you of the advertisements and content that has been delivered to you, such as whether you have clicked on an advertisement.

BrightOwl reserves the right to at any time make any modifications to the Cookie Policy via a notice on the website or via e-mail. You will be deemed to accept the modifications if you do not object thereto via e-mail within a period of one month as from the date of the notice. If you do object to the modifications, BrightOwl will be entitled to restrict, suspend, block or remove your account and/or your access to the website or to your account. You agree to refer to the website from time to time to verify whether such modifications have been made.