COOKIE POLICY

This Cookie Policy (the "**Policy**") informs visitors (hereinafter referred to as "**Users**") of the website https://adventum.eu/ (hereinafter referred to as the "**Website**") operated by **Adventum International Ltd.** of the processing of data in relation to the application of cookies.

## 1. General information

1.1. Name and contact details of the Controller: **Adventum International Ltd.**, with registration number C88511 and registered office at 23, Triq in-Nofs in-Nhar, Valletta VLT 1102 Malta (hereinafter referred to as the "**Company**" or the "**Controller**"); e-mail address: dataprotection@adventum.eu

1.2. This Policy has been prepared in accordance with the applicable laws relevant to data protection, in particular 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 ("**GDPR**").

## 2. Definition and types of cookies

2.1. A "**Cookie**" is a small text file that the Website stores on the User's computer or mobile device when the User visits and makes use of the Website. The purpose is to enable the site to remember the User's preferences (such as User name, language, etc.) for a certain period of time.

2.2. Cookies can be classified according to their duration of storage, place of origin and purpose of use. In terms of duration, temporary Cookies are automatically deleted at the end of a browsing session or when the browser is closed, whereas permanent Cookies remain stored for a longer period. In terms of origin, Cookies are classified as first-party or third-party Cookies, whereby first-party Cookies are Cookies set by the Website, while third-party Cookies are those set by external services. In terms of purpose, Cookies may be classified as necessary, statistical, and marketing Cookies.

2.3. "**Necessary Cookies**" ensure the usability and normal functioning of the Website. The use of Necessary Cookies serves the purpose of identifying the User's computer and browser, so that the User is not required, inter alia, to accept the Company's policies and to select the settings necessary for the use of the Website during each visit. The personal data processed by the Necessary Cookies may include, among others, the User's IP address, the type of device and browser, and the place of visit. Necessary Cookies are not suitable for direct personal identification by the Company, as the Cookies do not identify the User themselves, but only their browser or device.

2.4. "**Statistical Cookies**" are cookies placed by third parties that analyse Users' website usage patterns, help to identify Users and provide traffic analytics through anonymous heat-map analysis. The data stored by Statistical Cookies includes, among other things, the activity on the

Website (e.g. opening, closing, actions taken). Statistical Cookies are also not suitable for direct identification of the User.

2.5. "**Marketing Cookies**" allow the Company to display personalised advertisements to the User based on the User's activity on the Website or other websites. Such activity may include, among other things, the User's itinerary, i.e. which pages the User has visited and what actions the User has performed on those pages prior to visiting the Website. Marketing Cookies do not directly identify the User.

## 3. Information on the Cookies used on the Website

3.1. Necessary Cookies

| **Service provider, cookie name** | **Scope of data collected** | **Description, purpose** | **Duration of data processing** |
|---|---|---|---|
| Google<br>test_cookie | Random number | Monitoring the functioning of Cookies in the browser | 15 minutes from the visit |
| Google Analytics<br>gat_UA-73003413-2 | Random number | Preventing Google Analytics from being overloaded | 1 minutes from the visit |

The legal basis for the processing of Necessary Cookies is the Company's legitimate interest in the proper functioning of the Website (Article 6(1)(f) GDPR). In the opinion of the Controller, the Website's use would be restricted without the application of these Cookies, thus the Controller has a legitimate interest in the normal operation of the Website. As Necessary Cookies only collect random data and these are not able to directly identify the User, the Controller has not identified User interests which are contradictory to the application of the Necessary Cookies.

3.2. Statistical Cookies

| **Service provider, cookie name** | **Scope of data collected** | **Description, purpose** | **Duration of data processing** |
|---|---|---|---|
| Google Analytics<br>_ga | Domain ID, random browser ID | The Google Analytics measurement code that loads on the Website can use this to identify whether the User being measured has previously visited | 2 years after the visit |

| | | | |
|---|---|---|---|
| | | the Website on the device being used with the browser being used (=not a new User, but a returning User). Google Analytics also uses this to chain all website interactions (page views, clicks, callback requests) of 1-1 User together as a User's "journey" from the first visit to the last. | |
| Google Analytics<br>_ga_D967W7RZKJ | User session for live pages | It helps to identify and manage as a single unit a User's individual visit (= session), which is the sum of page views and other interactions (clicks, video views, etc.) within a given time frame. | 2 years after the visit |
| Google Analytics<br>_ ga_TW5WGPCCM2 | User session for test pages | It helps to identify and manage as a single unit a User's individual visit (= session), which is the sum of page views and other interactions (clicks, video views, etc.) within a given time frame. | 2 years after the visit |
| Google Analytics<br>_gid | User session Browser ID | This is used to determine how many people have visited the site on a | 1 day from the visit |

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|---|---|---|---|
| | | given day (not how many times). For Google Analytics reports, they store information anonymously and assign a randomly generated number to recognise unique visitors. | |

The legal basis for the processing of Statistical Cookies is the consent of the User (Article 6(1)(a) GDPR).

3.3. Marketing Cookies

| **Service provider, cookie name** | **Scope of data collected** | **Description, purpose** | **Duration of data processing** |
|---|---|---|---|
| Facebook<br>_fbc | Facebook click ID | It can link Website interactions (e.g. a callback request) back to the last click on Facebook, which is typically a Facebook ad. This makes it possible to measure and optimise a Facebook campaign. | 3 months after the visit |
| Facebook<br>_fbp | Domain ID, random browser ID | The Facebook measurement code can use it to identify whether the User being measured has visited the website before on the device being used with the browser being used (=not a new User, but a returning User). | 3 months after the visit |

| | | | |
|---|---|---|---|
| | | Facebook also uses it to chain all the Website interactions of 1-1 User (page views, important clicks, callback requests) as a User's "journey" from the first visit to the last. | |
| Google<br>1P_JAR | Timestamp | Google uses it to display personalised ads on Google sites based on recent searches and past interactions. | 1 month after the visit |
| Google<br>AEC | Browser ID | Google uses it to store User preferences and information when you view pages mapped by Google. | 6 months after the visit |
| Google<br>CONSENT | Composite value: yes/no status in relation to their own consent, timestamp, and language ID. | Google stores here whether and when the User has given consent to the collection of data. | 2 years after the visit |
| Google<br>IDE | Browser ID | Google uses it to store User preferences and information of the time of viewing sites mapped by Google (DoubelClick cookie). | 13 months after the visit |

| | | | |
|---|---|---|---|
| Google<br>NID | Browser ID | Google uses it to display personalised ads on Google sites based on recent searches and past interactions. | 6 months after the visit |
| Google<br>SID | Browser ID | This is used to store the User's Google Account ID and last login time in encrypted and digitally signed form. | 2 years after the visit |
| Google Ads<br>_gcl_au | Google Ads ad click ID | It helps Google Ads so that if the User moves on from the ad landing page to another subpage, it can also link the completed business goals (e.g. callback request) to the Google Ads ad that triggered the visit. This helps to find effective ads, helps to optimise ad spending, increase ad effectiveness. | 3 months after the visit |

The legal basis for the processing of Marketing Cookies is the consent of the User (Article 6(1)(a) GDPR).

3.4. With regard to the use of Cookies, the Company informs Users that most browser programs (usually in the settings menu) allow the User to disable or restrict the use of Cookies, but this may negatively affect the proper use of the Website. You can find out more of the use and settings of Cookies for commonly used browsers via the links below:

- https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=hu

- https://support.microsoft.com/hu-hu/microsoft-edge/cookie-k-t%C3%B6rl%C3%A9se-a-microsoft-edge-ben-63947406-40ac-c3b8-57b9-2a946a29ae09
- https://support.mozilla.org/hu/kb/weboldalak-altal-elhelyezett-sutik-torlese-szamito
- https://support.apple.com/hu-hu/guide/safari/sfri11471/mac

**4. Profiling**

4.1. Marketing Cookies are used for profiling purposes. Although Marketing Cookies are not suitable to directly identify the User, they identify which advertisements the User may be interested in based on the User's session, including, among others, which page the User clicked on, how much time the User spent on the page, which videos the User watched, and displays personalised advertisements to the User based on this information. The User shall always retain the right to withdraw his/her consent or object to profiling at any time.

**5. Enforcement, other provisions**

5.1. For the exercise of data subjects' rights and in matters not covered by this Policy, the Company's Data Privacy Policy available at https://adventum.eu/document/privacy-policy/ shall apply.