



## **Cookie Policy**

February 2024

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## 1. WHAT IS THE PURPOSE OF THIS COOKIE POLICY?

The purpose of this cookie policy (**Cookie Policy**) is to explain everything related to the use of cookies or similar tracking devices used in the website currently available at [www.xorogold.com](http://www.xorogold.com) (**Website**) provided by us, which may affect users who access, use or enjoy the Website by any means (**Website User(s)** or **you**).

This Cookie Policy will be applicable to you when you act as a Website User and we use cookies.

The Website is integrated into and is the entry point to a platform (**Platform**) intended, among other things, to facilitate the exchange of gold bullion and related solutions (**Gold Bullion Services**). All of the terms applicable in this Cookie Policy shall be applicable to both the Website and the integrated Platform.

If you choose not to use some cookies, the Website or some of its functionalities may not function perfectly. The authorisations you grant us to install cookies will apply only to the specific Website on which you have granted them. XORO will not install cookies on other websites unless you have expressly agreed to this on these other websites.

For more information regarding the processing of your personal data, please see our [Privacy Policy](#).

## 2. WHO IS THE DATA CONTROLLER?

Xoro Gold Systems, S.L. (**XORO** or **we**) performs certain actions related to the installation of cookies and similar tracking technologies. Therefore, XORO is the data controller of your personal data that we obtain through such technologies.

You can contact XORO by using the following contact details:

- Registered office: Calle Príncipe de Vergara 112, Planta Cuarta, 28002, Madrid.
- Email address: [enquiries@xorogold.com](mailto:enquiries@xorogold.com).

In addition, please note that certain cookies are third party cookies. In such cases, the relevant third party will also process the information about you that the cookies collect. You can consult the identity of these third parties in section 5 below.

## 3. WHAT ARE COOKIES?

Cookies are small information files which are downloaded and stored on your device when you browse the Internet or access certain applications, sites, blogs, or similar web services. Among other things, cookies can store and retrieve information about your browsing habits or your computer and, depending on the information they contain and how you use your computer, can be used to recognise you.

Cookies may be installed either directly by the websites you visit or by third parties with whom you interact, allowing them to learn about your activity on the Website or on other websites or digital platforms belonging to the same advertising network as the Website. For example: the location from which you access, the time of connection, the type of device from which you access, the operating system and browser used, the most frequently visited pages, the number of clicks made and other data relating to your behaviour on the internet.

#### 4. HOW TO ACCEPT OR REJECT THE INSTALLATION OF COOKIES?

When you access the Website, in accordance with current regulations, we inform you about the use of cookies by means of an informative banner. In this banner, we give you the option to expressly accept, reject or configure the installation of cookies. That is, you can choose which types of cookies we can install and which we cannot. With the exception of technical cookies and those strictly necessary for the operation of our Website, we will not install any cookies on your device without your consent. Therefore, the legal basis for the processing of your personal data that we obtain through cookies is your prior consent.

At any time, you can configure the installation of cookies according to your preferences through the control panel that you can access through the information banner and the following link:

[www.xorogold.com](http://www.xorogold.com).

In addition, you can also adjust your browser settings to manage the cookies installed on your device, revoke your consent and delete them, as well as be notified before they are downloaded or refuse their installation by default. To do this, you will have to separately adjust the settings of each browser and device you use, as cookies are associated with the browser, not the user. You may do so at the following sites:

- Apple Safari: <https://support.apple.com/en-us/HT201265>
- Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en&sjid=10409786189270001609-EU>
- Internet Explorer: <https://support.microsoft.com/en-au/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>

#### 5. WHAT TYPES OF COOKIES WE USE?

We use own and third party cookies of the following types:

- **Technical cookies:** They are those that allow users to navigate through a website, platform or application and the use of the different options or services that exist in it as well as those that allow to remember customisation settings when it is the user who chooses the characteristics of the interface (such as, for example, control traffic and data

communication), identify the session, access restricted areas, remember the elements that make up an order, make the purchase process of an order, make the application for registration or participation in an event, use security features while browsing, store content for broadcasting video or sound, or share content through social networks, or remember the selection of a language.

According to applicable regulations, the user's consent is not required for the installation of these cookies.

- **Personalisation cookies:** They are those that allow users to access the website or service with some general characteristics predefined according to a series of criteria in the user's terminal such as the language, the type of browser used to access the service, the regional configuration from which you access the service, etc.

For this purpose, we use our own cookies.

- **Analysis cookies:** They are those that, either processed by us or by third parties, allow us to track our Website performance, quantify the number of users and thus to measure and statistically analyse the use made by users of the services offered. To this end, we can analyse your browsing on our Website in order to improve the range of products and services we offer.

For this purpose, we use our own cookies and cookies managed by the following third parties: New Relic.

## 6. FOR HOW LONG DO WE STORE YOUR PERSONAL DATA COLLECTED THROUGH COOKIES?

We will store your personal data obtained through cookies in a manner consisted with the purpose for which it was collected. That is:

- Data collected through technical cookies: 8 hours.
- Data collected through personalisation cookies: 8 hours. Device and browser details are stored indefinitely.
- Data collected through analysis cookies: 1 year.

Thereafter, we will only store your personal data "archived". This means that we will only use your personal data for the formulation, exercise or defence of possible claims or to make your personal data available to the courts or competent public authorities and during the periods of limitation of any liability actions that may exist. Once this period has expired, we will proceed to delete them definitively.

## 7. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may share the data obtained through the installation of cookies with service providers for the management, analysis and improvement of our Website and with the entities identified as third party cookie installers. These third parties are independently responsible for the data processing that they carry out without the intervention and outside the control of XORO.

Some of the aforementioned recipients are located in countries outside the European Economic Area (**EEA**). These countries do not always offer the same levels of protection for your personal data, so European legislation has established requirements for transfers of personal data outside the EEA. In such cases, we will implement the necessary instruments to ensure the protection of your personal data in the destination country. You may find more information on these measures in our [Privacy Policy](#).

For their part, the aforementioned third parties that also process your data collected through cookies installed on the Website may also transfer your data to third countries that are not secure. We recommend that you consult the following information regarding each third party in their relevant privacy notices.

## 8. WHAT ARE YOUR DATA PROTECTION RIGHTS?

For more informing on how to exercise your data protection rights regarding the data we collect through cookies on the Website, please see our [Privacy Policy](#).

## 9. DO WE MODIFY THIS COOKIE POLICY?

We may modify the content of this Cookie Policy at any time to reflect the reality of our use of cookies and always in accordance with applicable law. We will publish the updated Cookie Policy on our Website.

*Last updated: February 2024.*