# **Cookie Policy of CG Trading Solutions Ltd**

This document informs Users about the technologies that help this Website to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with this Website.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

This Website uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

# Activities strictly necessary for the operation of this Website and delivery of the Service

This Website uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

#### **Third-party Trackers**

# Traffic optimization and distribution

This type of service allows this Website to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Website and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

# Cloudflare (Cloudflare, Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through this Website, i.e., communication between this Website and the User's browser, while also allowing analytical data from this Website to be collected.

Personal Data processed: Trackers and various types of Data as specified in the privacy policy of the service.

Place of processing: United States - Privacy Policy.

# Other activities involving the use of Trackers

# **Functionality**

This Website uses Trackers to enable basic interactions and functionalities, allowing Users to access selected features of the Service and facilitating the User's communication with the Owner.

# Registration and authentication

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, this Website will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

#### **Stripe OAuth (Stripe Inc)**

Stripe OAuth is a registration and authentication service provided by Stripe, Inc. and is connected to the Stripe network.

Personal Data processed: Tracker and various types of Data as specified in the privacy policy of the service.

Place of processing: US – Privacy Policy.

Storage duration:

\_\_stripe\_mid: 1 year stripe\_sid: 30 minutes

# **Experience**

This Website uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

#### **Content commenting**

Content commenting services allow Users to make and publish their comments on the contents of this Website.

Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

#### Comment system managed directly (this Website)

This Website has its own internal content comment system.

Personal Data processed: Cookies, email address, first name and last name.

#### Facebook Comments (Facebook, Inc.)

Facebook Comments is a content commenting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, enabling the User to leave comments and share them on the Facebook platform.

Personal Data processed: Cookies and Usage Data.

Place of processing: US – <u>Privacy Policy</u>.

#### Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

# Google Maps widget (Google Inc.)

Google Maps is a maps visualization service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Cookies and Usage Data.

Place of processing: US – Privacy Policy.

#### Instagram widget (Instagram, Inc.)

Instagram is an image visualization service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Cookies and Usage Data.

Place of processing: US – Privacy Policy.

#### **Google Fonts (Google Ireland Limited)**

Google Fonts is a typeface visualization service provided by Google Ireland Limited that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

#### Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Website for the purpose of saving and reusing data.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

#### Mailchimp widget (The Rocket Science Group, LLC.)

The Mailchimp widget is a service for interacting with the Mailchimp email address management and message sending service provided by Intuit Inc.

Personal Data processed: Cookies and email address.

Place of processing: USA – <u>Privacy Policy</u>.

Storage duration:

• cookies.js: duration of the session

### Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website. The interaction and information obtained through this Website are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on this Website isn't being connected back to the User's profile.

# Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Cookies and Usage Data.

Place of processing: US – Privacy Policy.

Storage duration:

• fbp: 3 months

#### PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data processed: Cookies and Usage Data.

Place of processing: See the PayPal privacy policy – Privacy Policy.

Storage duration:

- akavpau\_ppsd: duration of the session
- ts: duration of the session

#### Pinterest "Pin it" button and social widgets (Pinterest)

The Pinterest "Pin it" button and social widgets are services allowing interaction with the Pinterest platform provided by Pinterest Inc.

Personal Data processed: Cookies and Usage Data.

Place of processing: US – Privacy Policy.

Storage duration:

• \_pin\_unauth: 1 year

• pinterest ct ua: duration of the session

## Measurement

This Website uses Trackers to measure traffic and analyze User behavior to improve the Service.

#### **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

#### Google Analytics (Universal Analytics) (Google Inc.)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Cookies and Usage Data.

Place of processing: US - Privacy Policy - Opt Out.

Storage duration:

- AMP\_TOKEN: 1 hour
- \_ga: 2 years
- \_gac\*: 3 months
- \_gat: 1 minute
- \_gid: 1 day

#### **Google Analytics 4 (Google Ireland Limited)**

Google Analytics 4 is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting Google's official documentation.

Personal Data processed: number of Users, session statistics, Trackers and Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

- \_ga: 2 years
- ga \*: 2 years

# Google Analytics Advertising Reporting Features (Google Ireland Limited)

Google Analytics on this Website has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyze specific behavior and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

Personal Data processed: Trackers, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and various types of Data as specified in the privacy policy of the service.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

IDE: 2 years\_gcl\_\*: 3 monthstest cookie: 15 minutes

#### Google Analytics Demographics and Interests reports (Google Ireland Limited)

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for this Website (demographics means age and gender Data).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

Personal Data processed: Trackers and unique device identifiers for advertising (Google Advertiser ID or IDFA, for example).

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

IDE: 2 years\_gcl\_\*: 3 monthstest\_cookie: 15 minutes

#### Anonymized analytics services

The services contained in this section allow the Owner, through the use of third-party Trackers, to collect and manage analytics in an anonymized form.

#### Google Analytics (Universal Analytics) with anonymized IP (Google Ireland Limited)

Google Analytics (Universal Analytics) is a web analysis service provided by Google Ireland Limited ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network. This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

• AMP TOKEN: 1 hour

\_ga: 2 years\_gac\*: 3 months\_gat: 1 minute\_gid: 1 day

#### Content performance and features testing (A/B testing)

The services contained in this section allow the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of this Website.

#### Google Optimize (Google Inc.)

Google Optimize is an A/B testing service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google").

Google may use Personal Data to contextualize and personalize the ads of its own advertising network.

Personal Data processed: Cookies and Usage Data.

Place of processing: US – Privacy Policy.

Storage duration:

\_gaexp: 3 months
\_opt\_awcid: 1 day
\_opt\_awgid: 1 day
\_opt\_awkid: 1 day
\_opt\_awmid: 1 day
\_opt\_expid: 10 seconds
opt\_utme: 1 day

#### Visual Website Optimizer (Wingify)

Visual Website Optimizer is an A/B testing service provided by Wingify Inc.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States – Privacy Policy.

# **Marketing**

This Website uses Trackers to deliver personalized marketing content based on User behavior and to operate, serve and track ads.

#### Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Website, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Website. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

#### Google Ad Manager (Google Ireland Limited)

Google Ad Manager is an advertising service provided by Google Ireland Limited that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with.

In order to understand Google's use of Data, consult Google's partner policy.

This service uses the "DoubleClick" Cookie, which tracks use of this Website and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

Personal Data processed: Tracker and Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u>.

# Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- gads: 2 years

- \_\_gsas: 2 years
- \_gac\_: 3 months
- \_gac\_gb\_: 3 months
- \_gcl\_au: 3 months
- \_gcl\_aw: 3 months
- \_gcl\_dc: 3 months
- \_gcl\_gb: 3 months
- \_gcl\_gf: 3 months
- gcl\_ha: 3 months
- id: 2 years
- test cookie: 15 minutes

# TikTok conversion tracking ( TikTok Information Technologies UK Limited )

TikTok conversion tracking is an analytics and behavioral targeting service provided by TikTok Information Technologies UK Limited that connects data from the TikTok advertising network with actions performed on this Website. The TikTok pixel tracks conversions that can be attributed to TikTok ads and enables to target groups of Users on the base of their past use of this Website.

Personal Data processed: Trackers, unique device identifiers for advertising (Google Advertiser ID or IDFA, for example) and Usage Data.

Place of processing: United Kingdom – Privacy Policy.

#### Meta ads conversion tracking (Meta pixel) (Meta Platforms Ireland Limited)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms Ireland Limited that connects data from the Meta Audience Network with actions performed on this Website. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt out</u>.

Storage duration:

- fbp: 3 months
- fr: 3 months

# Remarketing and behavioral targeting

This type of service allows this Website and its partners to inform, optimize and serve advertising based on past use of this Website by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the <u>Network Advertising Initiative opt-out page</u>.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

#### Google Ad Manager Audience Extension (Google Ireland Limited)

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google Ireland Limited that tracks the visitors of this Website and allows selected advertising partners to display targeted ads across the web to them.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Tracker and Usage Data.

Place of processing: Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months

- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- \_\_gads: 2 years
- gsas: 2 years
- gac: 3 months
- \_gac\_gb\_: 3 months
- gcl au: 3 months gcl aw: 3 months
- \_gcl\_dc: 3 months
- gcl gb: 3 months
- gcl gf: 3 months
- gcl ha: 3 months
- id: 2 years
- test cookie: 15 minutes

# How to manage preferences and provide or withdraw consent

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences privacy widget, if available.

It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent preferences.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

# **Locating Tracker Settings**

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer
- Microsoft Edge
- Brave
- Opera

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

#### How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by YourOnlineChoices (EU and UK), the Network Advertising Initiative (US) and the Digital Advertising Alliance (US), DAAC (Canada), DDAI (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

#### Consequences of denying the use of Trackers

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help this Website to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

#### **Owner and Data Controller**

CG Trading Solutions Ltd Trading as Unique Personalised Gifts

4-5 Russell Court, Palace Street, Plymouth PL1 2AS

Owner contact email: contactus@cgtradingsolutionsltd.co.uk

Since the use of third-party Trackers through this Website cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by this Website.

# **Definitions and legal references**

#### Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

# **Usage Data**

Information collected automatically through this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### User

The individual using this Website who, unless otherwise specified, coincides with the Data Subject.

# **Data Subject**

The natural person to whom the Personal Data refers.

#### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

## **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

# This Website (or this Application)

The means by which the Personal Data of the User is collected and processed.

# Service

The service provided by this Website as described in the relative terms (if available) and on this site/application.

# **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

# Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

# Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

# Legal information

This privacy policy relates solely to this Website, if not stated otherwise within this document.

Latest update: March 27, 2024