

Cookies Policy

1. Introduction

This Cookies Policy explains how Pilot Tech Ltd and its affiliates ("Company", "we", "our", "us") use cookies and similar technologies on the PayPilot website and platform (the "Platform").

Cookies are small text files stored on a user's device (computer, mobile device, or tablet) when visiting a website. Cookies allow websites to recognise a user's device and store certain information regarding user preferences, behaviour, and interactions with the Platform.

The Company uses cookies and similar technologies to:

- ensure proper functioning of the Platform
- provide essential security and fraud prevention mechanisms
- store user consent preferences
- enable authentication and session management
- analyse website traffic and user behaviour
- improve Platform performance and usability
- remember user preferences and settings
- support integrations with third-party services
- detect and prevent malicious or automated activity
- ensure regulatory compliance and audit logging

The Company uses both **first-party cookies** (set by the Company) and **third-party cookies** (set by service providers acting on our behalf).

Third-party services used on the Platform may include, but are not limited to:

Analytics and performance services

- Google Analytics
- Microsoft Clarity
- Hotjar
- LinkedIn Insight Tag
- Meta (Facebook) Pixel

These services help us understand how users interact with the Platform and improve functionality and performance.

Functional and infrastructure services

- Google Tag Manager
- Cloudflare
- Sentry
- LinkedIn Plugin
- Google Fonts
- Akamai
- Google reCAPTCHA

These services support security, content delivery, bot detection, performance optimisation, and technical monitoring.

Consent management and essential services

- Usercentrics Consent Management Platform
- Google Syndication
- gstatic.com

These cookies are required to store user consent preferences and ensure proper operation of the cookie management system.

In addition, the Platform may use cookies or similar technologies related to:

- KYC verification processes
- AML/CFT compliance monitoring
- sanctions screening
- fraud detection and prevention
- security logging and access control
- regulatory audit requirements

These technologies may be activated depending on user interaction with the Platform and applicable compliance requirements.

Cookies may be classified as:

- session cookies (deleted when browser closes)
- persistent cookies (stored for defined retention period)
- first-party cookies
- third-party cookies

The Platform uses a consent management mechanism provided by **Usercentrics GmbH**, which allows users to control cookie preferences and manage consent in accordance with GDPR and ePrivacy requirements.

Non-essential cookies are disabled by default and are only activated after user consent.

2. Types of Cookies We Use

We use the following categories of cookies:

Strictly Necessary Cookies

Strictly necessary cookies are essential for the operation, security, and functionality of the Platform. These cookies cannot be disabled through the cookie preference center, as the Platform would not function properly without them.

These cookies are typically set in response to user actions such as:

- logging into secure areas of the Platform
- maintaining authenticated user sessions
- completing forms or submitting information
- storing cookie consent preferences
- enabling core website functionality
- ensuring platform security and access control
- fraud detection and prevention

- bot detection and abuse prevention (e.g. reCAPTCHA)
- load balancing and infrastructure stability
- network and content delivery optimisation
- error monitoring and system diagnostics
- regulatory compliance logging and audit requirements

These cookies may be provided by the Company or by essential third-party infrastructure providers, including but not limited to:

- Usercentrics Consent Management Platform
- Cloudflare
- Akamai
- Google reCAPTCHA
- Google gstatic.com
- Google Syndication
- security and infrastructure providers

These cookies do not require user consent and are processed based on the Company's legitimate interest in ensuring:

- secure Platform operation
- service availability
- fraud prevention
- regulatory compliance
- proper functioning of the cookie consent mechanism

Legal basis: Legitimate interest (Art. 6(1)(f) GDPR)

Analytics / Performance Cookies

Analytics and performance cookies allow us to measure, analyse, and improve the performance of the Platform. These cookies collect information about how users interact with the website, which helps us understand usage patterns and optimise functionality.

These cookies may collect information such as:

- number of visitors
- pages visited
- time spent on pages
- navigation paths
- traffic sources
- click behaviour
- scroll behaviour
- interaction with UI elements
- device and browser type
- approximate geographic location
- performance and loading metrics

Analytics cookies used on the Platform may include services such as:

- Google Analytics
- Microsoft Clarity
- Hotjar
- LinkedIn Insight Tag

- Meta (Facebook) Pixel (analytics functionality)

These cookies help us:

- understand user behaviour
- improve user experience
- monitor platform performance
- identify technical issues
- optimise content and layout
- measure effectiveness of platform features

These cookies are only activated after the user provides explicit consent via the cookie banner.

Legal basis: User consent (Art. 6(1)(a) GDPR)

Functional Cookies

Functional cookies allow the Platform to provide enhanced functionality, security features, and personalization. These cookies enable the Platform to remember user choices and provide more tailored features.

These cookies may be used for:

- remembering user preferences
- language selection
- region selection
- UI customization
- saving platform settings
- remembering consent preferences
- enabling embedded services
- maintaining session preferences
- authentication-related functionality
- infrastructure optimisation
- bot detection and security features

Functional cookies used on the Platform may include services such as:

- Google Tag Manager
- Cloudflare
- Sentry
- LinkedIn Plugin
- Google Fonts
- Akamai
- Google reCAPTCHA

If these cookies are disabled, some parts of the Platform may not function properly.

These cookies are only activated after user consent where required.

Legal basis: User consent (Art. 6(1)(a) GDPR)

Marketing / Advertising Cookies

Marketing and advertising cookies may be set by third-party partners to track user activity across websites and deliver relevant advertising or measure campaign effectiveness.

These cookies may:

- track users across websites
- build user behaviour profiles
- measure advertising performance
- track conversions
- measure campaign effectiveness
- enable retargeting
- track interactions with marketing content
- support social media integrations

Marketing cookies used on the Platform may include:

- Meta (Facebook) Pixel
- LinkedIn Insight Tag
- third-party advertising and analytics partners

These cookies may collect:

- browsing behaviour
- pages visited
- interactions with advertisements
- device identifiers
- IP address (where applicable)
- marketing attribution data

These cookies are disabled by default and are only activated after the user provides explicit consent via the cookie banner.

Legal basis: User consent (Art. 6(1)(a) GDPR)

3. Cookie Consent Mechanism

The Platform uses a cookie consent management solution provided by **Usercentrics GmbH** to manage cookies and user preferences in accordance with GDPR and ePrivacy requirements.

When users first visit the Platform, they are presented with a cookie banner that allows them to manage their cookie preferences before any non-essential cookies are activated.

The cookie banner allows users to:

- accept all cookies
- reject all non-essential cookies
- customize cookie preferences by category
- access detailed information about each cookie category
- review third-party providers
- withdraw consent at any time

Non-essential cookies, including analytics, functional, and marketing cookies, are **disabled by default** and are only activated after the user provides explicit consent.

Strictly necessary cookies are always active, as they are required for the operation, security, and functionality of the Platform.

User consent is collected in a granular manner, allowing users to select specific cookie categories, including:

- Strictly Necessary Cookies
- Analytics / Performance Cookies
- Functional Cookies
- Marketing / Advertising Cookies

Users can modify or withdraw their consent at any time by:

- accessing the **Cookie Settings** link available on the Platform
- reopening the cookie banner
- updating preferences in the consent management interface

When consent is withdrawn, previously enabled non-essential cookies are automatically disabled and no further data is collected.

The consent management system also:

- stores user consent preferences
- logs consent choices for audit purposes
- ensures cookies are categorized correctly
- prevents non-essential cookies from loading before consent
- allows users to review third-party cookie providers
- supports regulatory compliance and transparency requirements

User consent records may be retained for compliance and audit purposes in accordance with applicable legal and regulatory requirements.

4. Third-Party Cookies

The Platform may use third-party cookies provided by trusted service providers to support analytics, security, infrastructure, functionality, and marketing activities.

These third parties may place cookies on users' devices when they interact with the Platform. The information collected by these cookies may be transmitted to and processed by the respective third-party providers in accordance with their own privacy and cookie policies.

Third-party cookies used on the Platform may include, but are not limited to, cookies from the following categories of providers:

Analytics and Performance Providers

These providers help us analyse Platform usage and improve performance:

- Google Analytics
- Microsoft Clarity
- Hotjar
- LinkedIn Insight Tag
- Meta (Facebook) Pixel

These cookies collect information such as:

- pages visited
- user interactions
- session duration
- navigation behaviour
- traffic sources
- performance metrics

Functional and Infrastructure Providers

These providers support Platform functionality, security, and performance:

- Google Tag Manager
- Cloudflare
- Sentry
- LinkedIn Plugin
- Google Fonts
- Akamai
- Google reCAPTCHA
- Google gstatic.com

These cookies may be used for:

- content delivery optimisation
- load balancing
- bot detection
- platform security
- UI rendering
- performance monitoring
- embedded functionality

Consent Management Provider

The Platform uses:

- Usercentrics Consent Management Platform

This provider sets cookies to:

- store user consent preferences
- remember cookie selections
- ensure compliance with GDPR requirements

Security, KYC and Fraud Prevention Tools

Depending on user interaction, the Platform may also use third-party technologies related to:

- KYC verification
- AML/CFT monitoring
- sanctions screening
- fraud detection
- risk scoring
- security logging

These technologies may not always appear as standalone cookie providers but may use similar tracking mechanisms where necessary for security and regulatory compliance.

The Company does not fully control third-party cookies.

These cookies are governed by the respective third parties' privacy and cookie policies.

Users are encouraged to review the privacy and cookie policies of these third-party providers for more information about how their data is processed.

Some third-party providers may process data outside the European Economic Area (EEA). Where this occurs, appropriate safeguards are implemented in accordance with GDPR requirements, including Standard Contractual Clauses (SCCs) or other lawful transfer mechanisms.

5. Cookie Retention Periods

Cookies used on the Platform may be stored for different periods depending on their purpose, category, and provider. Cookies are generally classified as either **session cookies** or **persistent cookies**.

Session Cookies

Session cookies are temporary cookies that are stored on the user's device only for the duration of a browsing session. These cookies are automatically deleted when the user closes their browser.

Session cookies are typically used for:

- maintaining user sessions
- authentication during login
- temporary security checks
- load balancing
- remembering temporary selections
- ensuring proper Platform functionality

These cookies do not remain on the user's device after the session ends.

Persistent Cookies

Persistent cookies remain stored on the user's device for a defined period of time or until manually deleted by the user. These cookies allow the Platform to remember user preferences and recognise returning users.

Persistent cookies may be used for:

- remembering cookie consent preferences
- storing user settings
- analytics and performance tracking
- fraud prevention and security monitoring
- improving Platform functionality
- saving language or region preferences
- measuring marketing effectiveness (where applicable)

The retention period for persistent cookies varies depending on:

- the cookie category
- the specific service provider
- regulatory requirements
- operational necessity

Retention periods may range from a few minutes to several months, and in some cases up to 24 months, depending on the specific cookie.

Detailed retention periods for each cookie are provided in the cookie table available through the Usercentrics cookie preference center.

Users may delete cookies at any time via browser settings. Users may also withdraw consent for non-essential cookies through the cookie settings available on the Platform.

6. Cookie Table

A detailed and regularly updated list of cookies used on the Platform is available through the Usercentrics cookie management tool. The cookie table is dynamically maintained and reflects the cookies currently in use on the Platform.

The cookie table includes the following information for each cookie:

- cookie name
- provider (first-party or third-party)
- purpose of the cookie
- cookie category
- retention period / expiration
- type (session or persistent cookie)

Cookies are grouped into the following categories:

- Strictly Necessary Cookies
- Analytics / Performance Cookies
- Functional Cookies
- Marketing / Advertising Cookies

The cookie table is automatically generated and updated based on the Platform's configuration and third-party integrations. This ensures transparency and consistency between:

- Cookies Policy
- Privacy Policy
- actual website behaviour
- consent management configuration

Users can access the full cookie list at any time by:

- clicking the **Cookie Settings** link on the Platform
- reopening the cookie banner
- accessing the cookie preferences panel provided by Usercentrics

The cookie preferences panel allows users to:

- view individual cookies

- see cookie providers
- review retention periods
- view cookie purposes
- enable or disable cookie categories (where applicable)

Non-essential cookies listed in the cookie table are only activated after user consent.

7. Data Transfers Outside the EEA

Some third-party cookie providers used on the Platform may process personal data outside the European Economic Area (EEA). This may occur where service providers are located in jurisdictions such as the United States or other countries that may not provide an equivalent level of data protection as required under GDPR.

Such transfers may occur in connection with the use of third-party services, including but not limited to:

- analytics providers
- infrastructure and content delivery providers
- security and fraud prevention providers
- embedded services providers
- marketing and performance tracking providers
- consent management providers

Where personal data is transferred outside the EEA through cookies or similar technologies, the Company ensures that appropriate safeguards are implemented in accordance with Chapter V of the GDPR.

These safeguards may include:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- adequacy decisions issued by the European Commission
- binding corporate rules (where applicable)
- additional technical and organisational safeguards
- data minimisation and pseudonymisation measures
- contractual data protection obligations imposed on service providers

In particular, certain third-party providers used on the Platform (such as analytics, performance monitoring, and infrastructure providers) may transfer limited technical data including:

- IP address
- device identifiers
- browser information
- interaction data
- usage statistics
- cookie identifiers

Such data is processed solely for the purposes described in this Cookies Policy and in accordance with applicable data protection laws.

Where required, additional safeguards may also include:

- encryption in transit

- restricted access controls
- limited retention periods
- contractual data processing agreements
- vendor due diligence and risk assessments

Users can obtain additional information regarding international data transfers by reviewing the privacy policies of the respective third-party providers or by contacting the Company.

Non-essential cookies that may involve international data transfers are only activated after the user provides explicit consent.

8. Managing Cookies

Users have full control over the use of non-essential cookies on the Platform. Cookies can be managed, modified, or withdrawn at any time using the available consent management tools and browser settings.

Users can control cookies through:

- the cookie banner displayed when first visiting the Platform
- the cookie settings panel available on the Platform
- the "Cookie Settings" link accessible at any time
- browser settings
- device privacy settings

Through the cookie settings panel provided by Usercentrics, users can:

- accept all cookies
- reject non-essential cookies
- enable or disable specific cookie categories
- review third-party providers
- view cookie purposes
- view retention periods
- withdraw previously given consent

If a user withdraws consent, non-essential cookies will no longer be used and previously stored cookies may be disabled where technically feasible.

Users may also delete cookies manually at any time through their browser settings. Instructions for managing cookies in common browsers are available at:

- Google Chrome
- Mozilla Firefox
- Microsoft Edge
- Safari

Please note that disabling strictly necessary cookies may impact the functionality, performance, and security of the Platform. Certain features may not operate correctly, including:

- login and authentication
- security and fraud prevention mechanisms
- form submission
- consent preference storage

- session management
- core platform functionality

Blocking all cookies via browser settings may also affect the availability of certain services and user experience.

For more information about how to manage cookies, users can refer to their browser's help documentation or device privacy settings.

9. Changes to this Cookies Policy

The Company may update this Cookies Policy from time to time to reflect changes in legal, regulatory, operational, or technical requirements, as well as updates to the cookies used on the Platform.

Such updates may occur, for example, in connection with:

- regulatory or legal changes (including GDPR and ePrivacy requirements)
- introduction of new cookies or tracking technologies
- changes to third-party service providers
- implementation of new Platform features or functionality
- updates to analytics, security, or infrastructure tools
- changes to consent management mechanisms
- improvements to transparency and compliance practices

Where material changes are made to this Cookies Policy, the Company may:

- update the "Last updated" date
- display a notification on the Platform
- request renewed cookie consent where required
- update the cookie banner or consent preferences

Users are encouraged to review this Cookies Policy periodically to stay informed about how cookies and similar technologies are used.

The latest version of this Cookies Policy will always be available on the Platform and will take effect from the date of publication, unless otherwise specified.

10. Contact

If you have any questions regarding this Cookies Policy, the use of cookies on the Platform, or the processing of data collected through cookies and similar technologies, you may contact the Company using the details below:

Email: support@paypilot.io

Users may contact the Company to:

- request additional information about cookies used on the Platform
- obtain clarification regarding third-party cookies
- request details about data transfers outside the EEA
- exercise data protection rights related to cookie data

- withdraw consent or request assistance managing cookie preferences
- report concerns regarding cookie usage
- request access to consent records (where applicable)

Requests will be handled in accordance with applicable data protection laws, including the GDPR.

If users believe that their data protection rights have been violated, they also have the right to lodge a complaint with their local data protection supervisory authority.