# **COOKIE POLICY**

This document has been prepared pursuant to EU Regulation 2016/679 (the "GDPR") to enable users to understand what cookies are installed when they use the website www.auditone.io (the "Website").

# 1. Data controller and data protection officer

Safura with a registered office in the Marshall Islands is the data controller of the personal data (the "Data") of the users of the Website collected using cookies. For any request it is possible to write to Dedalus at the above-mentioned physical address or through the e-mail address David@auditone.io.

## 2. Data processed by Safura

The navigation on the Website involves the use of cookies, short strings of text that the websites visited send to the user's browser, where they are stored and then transmitted to the same websites during subsequent visits. While browsing a site, the user may also receive cookies on their computer from sites or web servers other than the one he/she is visiting (so-called "third party" cookies). It is possible to distinguish:

- 1. Necessary cookies are absolutely essential for the website to function properly. These cookies ensure basic functionalities and security features of the website.
- Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc.
- 3. Marketing cookies are used to target advertising to a user (behavioural targeting). They are often served by third party companies, and track a user across websites.

This Website uses the following cookies:

Cookie Name	Domain	Description	Duration	Category
cf_bm	hsforms.n et	This cookie, set by Cloudflare, is used to support Cloudflare Bot Management.	1 hour	Necessary
guest_id_marketing	twitter.co m	Twitter sets this cookie to identify and track the website visitor.	1 year 1 month 4 days	Advertisement
guest_id_ads	twitter.co m	Twitter sets this cookie to identify and track the website visitor.	1 year 1 month 4 days	Advertisement

personalization_id	twitter.co m	Twitter sets this cookie to integrate and share features for social media and also store information about how the user uses the website, for tracking and targeting.	,	Advertisement
guest_id	twitter.co m	Twitter sets this cookie to identify and track the website visitor. It registers if a user is signed in to the Twitter platform and collects information about ad preferences.	1 year 1 month 4 days	Advertisement
muc_ads	t.co	Twitter sets this cookie to collect user behavior and interaction data to optimize the website.	1 year 1 month 4 days	Advertisement

While technical cookies cannot be refused by the user of the Website, as they are strictly functional to the Website itself, the user can freely choose to accept or refuse the use of profiling cookies. The user can set and review their choices regarding cookies here with the "cookies setting" function available on the website (privacy section).

#### 3. Purposes and legal basis of the processing

By using cookies, the following purposes are pursued:

- 3.1 to enable the navigation of the Website and its smooth functionality. The legal basis for the processing is the provision to users of services related to the Website and the legitimate interest of Dedalus to have a functional website.
- 3.2 to fulfil any obligations under applicable laws, regulations, or EU legislation, or to comply with requests from the authorities. The legal basis for the processing is the obligation of Dedalus to comply with mandatory legislation.
- 3.3 analyse user behaviour and possibly send him advertising messages in line with the preferences expressed by the same during navigation. The legal basis for processing in this case is the consent of the interested party.
- 3.4 for the needs of defence of the rights of Dedalus in the context of any litigation, even in court. The legal basis of the processing is the legitimate interest of the Owner to protect its rights.

The conferment of Data is optional, but (except in cases of processing based on consent) the failure to provide Data prevents the Controller from allowing the navigation of the Website.

### 4. Recipients of the Data

The Data may be communicated:

- (a) to third parties who need to perform specific activities in relation to the Data, in accordance with the purposes of the processing, or to service providers to the Data Controller.
- (b) to authorities, entities and/or parties to whom the Data must be disclosed, pursuant to binding legal or contractual provisions.
- (c) in other circumstances, such as acquisitions and sales to potential third-party companies, when we expect to sell or transfer part of or all our business.

### 6. Transfer of Data outside the European Economic Area

As for the possible transfer of Data to countries not belonging to the European Economic Area, the processing will take place according to one of the legally permitted methods and therefore through the selection of recipients established in countries considered adequate by the European Commission or through the stipulation of standard contractual clauses.

#### 7. Data retention

The Data will be kept only for the time necessary for the purposes for which they were collected, respecting the principles of conservation limitation and minimization. More precisely, the terms of duration of the cookies are defined in the previous section 2. For the Data whose processing is based on the consent of the interested party, it is specified that the same will be kept until such consent is revoked.

#### 8. Data subjects' rights

In the presence of the relevant legal prerequisites, the data subject may ask the Data Controller or the DPO for access to their Data, to rectify or erase them or to object to their processing, to request the restriction of processing in the cases provided for by Article 18 GDPR, as well as to obtain in a structured, commonly used, and machine-readable format the data concerning him/her, in the cases provided for by Article 20 GDPR.

In addition, the user has the right to revoke any consent to processing at any time, without affecting the lawfulness of the processing carried out by the Controller before the revocation.

Requests should be made in writing to the Data Controller at the addresses indicated above.

In any case, the interested party may lodge a complaint with the Guarantor for the Protection of Personal Data if he believes that the processing of his Data is contrary to the regulations in force.