COOKIES POLICY

We use cookies to give you a better service and provide you a better browsing experience, as well as to be able to show you advertising based on your browsing habits. We are responsible for the installation of the cookies that we use and what we do with the data we obtain from them, either through our own cookies or from third parties.

In the following table you will find links to facilitate access to the points of this policy that are of your interest, however, we strongly recommend reading it in its entirety:

- 1. What are cookies and what other things are stored in the browser?
- 2. Are they dangerous?
 - Technical and preference cookies have more benefits than risks
 - Statistical cookies NEITHER suppose an appreciable risk
 - Own cookies do not usually carry an appreciable risk for you
- 3. What technical cookies do we use and for what?
- 4. We do not use preference cookies
- 5. We do not use statistical cookies
- 6. We do not use marketing cookies
- 7. What other elements are stored in the browser and for what?
- 8. How can I manage or disable cookies?
- 9. Modifications of this Cookies Policy

1. What are cookies and what other things are stored in the browser?

Cookies are small text files that are stored in your browser when you visit our website. These files contain information about your browsing and interaction with our website, with the purpose of making your user experience more efficient and being able to show you advertising based on your browsing habits. Some cookies are essential for the proper functioning of our website, such as technical or user interface personalization cookies, and others, such as analysis cookies or behavioural advertising (or marketing) cookies, require that we inform you about his existence and that we need your consent in order to use them.

Local Storage and Session Storage are two data storage spaces located in your device's browser and, like cookies, can be own (when are created by our own website) or thirdparty (when are created by our service providers or our partners). The difference between the two spaces is that Local Storage stores information indefinitely or until you decide to clear the browser data, while Session Storage stores information for as long as the tab where our website is being used remains open and, once closed, the information is deleted. The difference with cookies is that these two spaces allow storing more information than cookies without impacting on the performance of our website.

You can get more information here

Finally, we inform you that although the purpose of the third-party cookies we use, for which we are responsible, is indicated in the tables of the following sections, these third parties may dedicate the data collected by their cookies to other purposes of which they are solely responsible for. In the case of third-party cookies, our responsibility for the purposes of the third parties is limited to the download of the cookies to your device (what we do for the stated purpose). You can find out about the purposes of these third parties, and whether they make data transfers to third countries in their corresponding policies (see the links in the table)

2. Are they dangerous?

Usually, the level of risk of cookies depends on the type of cookies, and whether they are own or third parties. Most cookies are not dangerous. Specifically:

Technical and preference cookies have more benefits than risks

The working group of article 29 (old GT29 and current European Committee for Data Protection) in its Opinion 4/2012, "<u>on the exemption from the cookie consent</u>", considers that they do not pose a risk for you nor does it exempt from the obligation to obtain prior consent to their use to all cookies that:

- are necessary for communications to be transmitted through a network between the user and the servers that host the website, and to all those that
- are necessary to provide a specific functionality explicitly requested by the user.

This exemption from the obligation to base the legality of its use on your consent, as it doesn't represent a risk for you, is also reflected in the cookie guides published by most of the Data Protection Agencies of the EU countries (for example, in the case of Spanish, it is included in section 4.1 of the guide on the use of cookies, from July 2020).

WG29 even defined the purposes that it explicitly considers to have more benefits than risks for you.

Purposes of cookies explicitly excluded from informed consent

Regarding its purpose, GT29 explicitly excludes the following cookies from the obligation to obtain the informed consent of the visitor:

- Cookies called "user input", which are usually used to track user's actions when the user fills in the online forms of an http session, or to remember the shopping basket that the user has selected in an e-commerce),
- Session cookies are used for user authentication or identification, which store a kind of token (witness that the user is who claims to be and has already been authenticated) to prevent this user from giving his username or password on each page he or she requests and has restricted access control,

- User security cookies, introduced specifically to strength the security of the service explicitly requested by the user. For example, to detect erroneous and repeated attempts to connect to a website, or abuses.
- Media player session cookies,
- Session cookies to balance the load on the information systems,
- User interface personalization cookies, such as to remember your preferred language, and
- Certain plug-in cookies to exchange social content.

Generally, in those cases in which a website offers its visitors a service, to use cookies exclusively for purposes for which it is not necessary to obtain consent, listed above, whether they are own or third parties, it will not be necessary for the website operator, in that case referring to us, to inform the visitor of their use or to obtain their consent.

Statistical cookies NEITHER suppose an appreciable risk

Regarding the treatment of data collected through analysis cookies, the aforementioned opinion of the current European Data Protection Committee stated that, although they are not exempt from the duty to obtain consent for their use, **it is unlikely to represent a risk** to users privacy whenever they are their own cookies, treat the aggregated data for a strictly statistical purpose, that provide information on their uses and include the possibility for users to express their refusal to use it.

Own cookies do not usually carry an appreciable risk for you

Own cookies are generated by our website, while third-party cookies are generated by services or providers independent of us, and are these independent providers who define the ends and means of the treatments they carry out.

Our sole responsibility regarding third-party cookies is the necessary collaboration of our website in the placement of these cookies on your computer, placement to which we will normally be obliged to be necessary to be able to use the services provided to us by these third parties (for example, to check that you are not a robot of these that abound on Internet, and so avoid the requests or comments that could be sent to us through the forms on our website which harm the attention of real users).

3. What technical cookies do we use and for what?

Technical cookies are those that allow the user to navigate through a website, platform, or application as well as the use of the different options or services that exist therein, including the management and operation of the website and enabling its functions and services (for example, identifying your session, accessing parts of the website that

have restricted access, remembering the elements that make up your order, carrying out the purchase process of your order, manage your payment, etc.). The website or app cannot function properly without these cookies, so they are considered necessary.

In our case, we use:

Cookie	Supplier	Purpose	Duration
complianz_policy_id	legalis.ad	Remember the cookie configuration accepted by the person concerned	1 year
complianz_consent_ status			
cmplz_stats			
cmplz_marketing			
_GRECAPTCHA	google.com	Differentiate between humans and robots to avoid the entrance of spam through the forms on this website	6 month

4. We do not use preference cookies

Preference or personalization cookies allow our website to remember information that changes the way our pages behave or look to differentiate your experience from the other users. As an example, it usually remembers the language you want to view our website. If you are the one who voluntarily chooses these features, for example, by marking the flag or letters that identify the language, it is considered a service expressly requested by you as long as the cookies obey exclusively for the purpose of personalization, so in this case it would not be necessary to ask you for an explicit authorization.

Our website does not use preference cookies:

5 We do not use statistical cookies

Statistical cookies, or analysis cookies, are those that allow to understand how visitors interact with the pages of our website and thus carry out statistical analysis of the services we provide. The information collected is used to measure the activity on our site in order to introduce improvements in the products and services that we offer you.

Our website does not use statistical cookies:

6. We do not use marketing cookies

Marketing or behavioral advertising cookies store information on user behavior obtained through continuous observation of your browsing habits, which allows developing a specific profile to show relevant and attractive advertisements to the individual user, and therefore, more valuable to third-party advertisers.

Our website does not use marketing cookies.

7. What other elements are stored in the browser and for what?

This website creates a storage space in the browser of the user's device using the **Local Storage** object for use by the following domains:

- www.e-financera.com, stores the following variables:
 - o is used for and is preserved for,
- www.google.com, stores the following variables:
 - is used for and is preserved for

This website also creates a storage space in the browser of the user's device using the **Session Storage** object for use by the following domains:

- www.e-financera.com, stores the following variables:
 - is used for and is preserved for
- www.google.com, stores the following variables:
 - o is used for and is preserved for

8. How can I manage or disable cookies?

You can manage and deactivate the cookies used by our website at any time from your browser, for example, to withdraw your consent, following the instructions provided by the manufacturer of your browser:

- Instructions for Microsoft Edge
- Instructions for Google Chrome
- Instructions for Google Android
- Instructions for Internet Explorer 11
- Instructions for Mozilla Firefox
- Instructions for Opera
- Instructions for Safari

If you disable the installation of cookies in your browser, you will be able to continue accessing our website with it, but your navigation may not be optimal and some of the services offered may not work properly.

9. Modifications/changes of this Cookies Policy

We will update this Cookies Policy whenever necessary to reflect changes in our products and services.

If there are substantial changes in this policy, we will notify you before they come into force by publishing a prominent notice in the cookies banner. In any case, we strongly recommend reviewing periodically this Cookie Policy to know what kind of cookies we use and how we use them.

Last update: 5th of April 2023-