

**Brokerage Company “Rioni Capital”**  
**POLICY**  
**on the use of Cookies files**

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## 1. GENERAL PROVISIONS

- 1.1. This Policy on the use of cookies files (hereinafter, the **Policy**) determines the procedure for the use of cookies files and similar technologies by the brokerage company “**Rioni Capital**” (hereinafter, the **Broker**) when visiting and using the Broker’s Website, as well as, where applicable, other public digital interfaces of the Broker.
- 1.2. This Policy has been developed in order to ensure transparency regarding:
  - what cookies files and similar technologies are;
  - what categories of cookies files may be used by the Broker;
  - for what purposes they are used;
  - on what grounds they are used;
  - how the user may manage their settings and preferences.
- 1.3. This Policy shall be read jointly with the Personal Data Protection Policy of clients of the brokerage company “**Rioni Capital**”, as well as with other applicable documents of the Broker posted on the Broker’s Website.
- 1.4. If information obtained through the use of cookies files or similar technologies relates to personal data, such information shall be processed in accordance with the applicable legislation of Georgia and the Personal Data Protection Policy of clients of the brokerage company “**Rioni Capital**”.

## 2. WHAT COOKIES FILES ARE

- 2.1. Cookies files are small text files that are stored in the browser or on the user’s device when visiting a website.
- 2.2. Cookies files allow, in particular:
  - to ensure the proper functioning of the website;
  - to save certain user settings;
  - to maintain the stability and convenience of using the website;
  - to analyze the use of the website and improve its functionality;
  - to ensure the operation of certain additional functions of the website where there are соответствующие основания.
- 2.3. For the purposes of this Policy, cookies files may also include technologies similar in purpose, including browser local storage, pixels, tags and other technical means used for the operation of the website, analytics and management of user settings.
- 2.4. Cookies files may be:
  - **session** — operating during the current browser session;
  - **persistent** — stored on the user’s device for a certain period or until deleted.

## 3. LEGAL GROUNDS FOR THE USE OF COOKIES FILES

- 3.1. The Broker uses cookies files and similar technologies in accordance with the applicable legislation of Georgia on personal data protection, and in cases where this is обусловлено the cross-border nature of certain services, relationships or technical solutions, also taking into account applicable international standards and requirements.
- 3.2. Depending on the category of cookies files, their use may be carried out:
  - without separate consent of the user — if such cookies files are strictly necessary for the functioning of the website or the provision of a digital service expressly requested by the user;

- on the basis of the user's prior consent — if functional, analytical, marketing or other non-essential cookies files are concerned.

**3.3.** User consent, where required, is requested through a cookie banner or another preference management mechanism available on the Broker's Website.

## **4. PURPOSES OF THE USE OF COOKIES FILES**

**4.1.** The Broker may use cookies files and similar technologies for the following purposes:

- ensuring the proper and stable functioning of the Broker's Website;
- providing the user with the requested website functionality;
- remembering user settings and preferences;
- analyzing the use of the website and improving its content, structure and functionality;
- identifying and eliminating technical errors;
- evaluating the effectiveness of certain informational, analytical and marketing solutions — where there is an appropriate legal basis.

## **5. CATEGORIES OF COOKIES FILES USED**

### **5.1. Strictly necessary cookies files**

- 5.1.1.** Strictly necessary cookies files are used to ensure the proper, stable and secure functioning of the Broker's Website, as well as to provide the user with the requested digital service.
- 5.1.2.** Without such cookies files, individual pages, sections or functions of the website may operate incorrectly or be unavailable.
- 5.1.3.** Strictly necessary cookies files are used without separate consent of the user to the extent permitted by applicable law.

### **5.2. Functional cookies files**

- 5.2.1.** Functional cookies files allow certain user settings and preferences to be remembered in order to improve the convenience of using the website.
- 5.2.2.** Such cookies files may be used, for example, for:
  - saving language selection;
  - saving interface settings;
  - personalizing certain elements of the website display.
- 5.2.3.** Functional cookies files are used on the basis of the user's consent, unless otherwise follows from their strictly necessary nature.

### **5.3. Analytical cookies files**

- 5.3.1.** Analytical cookies files are used in order to understand how users interact with the Broker's Website.
- 5.3.2.** Such cookies files may be used for:
  - analyzing website traffic;
  - assessing the demand for individual pages and sections;
  - improving the structure and content of the website;
  - identifying technical problems and improving the user experience.
- 5.3.3.** Analytical cookies files are used on the basis of the user's consent, unless applicable law permits a different regime.

### **5.4. Marketing cookies files**

- 5.4.1. Marketing cookies files may be used to evaluate the effectiveness of informational and advertising campaigns, as well as to set up relevant communications, if such mechanisms are used by the Broker.
- 5.4.2. Such cookies files may be set both by the Broker itself and by third parties providing relevant services.
- 5.4.3. Marketing cookies files are used exclusively where the user's prior consent is obtained.

## **6. THIRD-PARTY COOKIES FILES**

- 6.1. The Broker may use third-party services which, depending on their function, may set their own cookies files or use similar technologies.
- 6.2. Such services may include, in particular:
  - web analytics services;
  - tools supporting website performance and stability;
  - providers of certain technical and infrastructure solutions;
  - services related to communication and marketing functions of the website.
- 6.3. If such third-party cookies are used, the relevant third parties process data in accordance with their terms of use and privacy policies, unless otherwise directly follows from the relationship between the Broker and the relevant provider.

## **7. USE OF COOKIES FILES IN THE BROKER'S DIGITAL SERVICES**

- 7.1. Certain cookies files may be objectively necessary for the functioning of the Broker's Website and certain digital services available to the user.
- 7.2. Disabling strictly necessary cookies files may result in restricted access to certain website functions, incorrect operation of certain sections, or the impossibility of using certain digital services.
- 7.3. This Policy applies primarily to the Broker's public digital environment. In cases where certain interfaces, services or solutions contain special notices on the use of cookies files or similar technologies, such notices shall apply in the relevant part together with this Policy.

## **8. RETENTION PERIOD OF COOKIES FILES**

- 8.1. The retention period of cookies files depends on their category, purpose, technical configuration and the features of the relevant service.
- 8.2. As a general rule:
  - session cookies files are stored until the end of the current browser session;
  - persistent cookies files are stored for the period necessary to achieve the relevant purpose, or until deleted by the user.
- 8.3. Current information on the categories of cookies files used and, where there is a relevant technical solution, their retention periods, may be disclosed to the user through a cookie banner, preference center or other interfaces of the Broker's Website.

## **9. MANAGEMENT OF COOKIES FILES**

### **9.1. Consent banner and preference settings**

- 9.1.1. Upon the first visit to the Broker's Website, as well as in other cases where required, the user may be offered the possibility to:
- accept all cookies files;
  - reject all non-essential cookies files;
  - select individual categories of cookies files;
  - change previously provided settings.
- 9.1.2. The user has the right to change their preferences regarding cookies files at any time through the settings management mechanism available on the website, if such mechanism is provided in the relevant interface.

## 9.2. Browser settings

- 9.2.1. The user may also independently manage cookies files through their browser settings, including:
- deleting cookies files;
  - blocking the installation of individual cookies files;
  - restricting the use of cookies files;
  - receiving notifications of their installation.
- 9.2.2. The user should take into account that blocking or deleting strictly necessary cookies files may affect the proper functioning of the Broker's Website and the availability of certain services.

## 10. PERSONAL DATA AND USER RIGHTS

- 10.1. To the extent that information obtained through cookies files or similar technologies relates to personal data, such processing shall be carried out in accordance with the Personal Data Protection Policy of clients of the brokerage company **"Rioni Capital"** and applicable law.
- 10.2. The user has the right to:
- withdraw previously given consent to the use of non-essential cookies files;
  - change their cookies files settings;
  - contact the Broker on issues related to the processing of personal data in the manner provided for by the Personal Data Protection Policy of clients.
- 10.3. Other rights of the data subject shall be exercised in the manner provided for by applicable law and the Personal Data Protection Policy of clients of the brokerage company **"Rioni Capital"**.

## 11. AMENDMENT OF THE POLICY

- 11.1. The Broker has the right to amend this Policy from time to time unilaterally by publishing a new version on the Broker's Website.
- 11.2. Amendments shall enter into force from the moment of publication of the new version of the Policy, unless otherwise expressly stated in the Policy itself.
- 11.3. The Policy may be updated, in particular, in connection with:
- changes in legislation;
  - changes in the technologies used;
  - changes in the structure of the website or the Broker's digital services;
  - implementation of new functions, services or technical solutions.

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On all matters related to this Policy or the use of cookies files, the user may contact the Broker at **info@rioni-capital.ge** or through the relevant feedback form posted on the Broker's Website.