AFORTI EXCHANGE ROMANIA SA

COOKIE POLICY

(updated 11th March 2019)

Aforti Exchange Romania SA ("**Aforti**" or "**We**") understands that your privacy is important to you and is committed to being transparent about the technologies it uses.

This Cookie Policy explains how and why Aforti uses cookies and similar technologies. This Cookie Policy should be read together with our Privacy Policy and our Terms and Conditions.

Contents of this Cookie Policy

1.   Legal framework

This Cookie Policy has been adopted by Aforti in accordance with the following laws and regulations:

(i)   EU Directive 2002/58/EC concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications);

(ii)   Law no. 506/2004 on the processing of personal data and the protection of privacy in the electronic communications sector, as amended by Law no. 235/2015 ("**Law no. 506/2004**");

(iii)   Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ("General Data Protection Regulation" or "**GDPR**"), as well as other applicable regulations at the European or local level, adopted in the context of GDPR.

2.   What are cookies and similar technologies?

A cookie is a small text file that a website saves on your computer, tablet or mobile device (the "**Device**") when you visit the Aforti's website. It enables the website to remember your actions and preferences over a period of time, so you don't have to keep re-entering them whenever you come back to our website or browse from one page to another, as well as to improve your experience on Aforti's website, to the extent you agree. These allows our website to recognize your device from those of other users of the website. The other tracking technologies used by Aforti work similarly to cookies and place small data files on your Device or monitor your website activity to enable us to collect information about how you use our website. Where we refer to cookies, we mean cookies or similar technologies.

3.   What are the different type of cookies?

Session cookies are only stored for the duration of your visit to our website and are deleted from your Device as soon as you close your browser;

Persistent cookies are saved on your device for a fix period of time after you close your browser and are used where we (or a third party) need to identify you for a later browsing session. We use persistent cookies to improve your experience of using our website. This includes recording your acceptance to our Cookie Policy to remove the cookie message which first appears when you use our website. Persistent cookies also include third party cookies that can be used anonymously to save the interests of users, in order to deliver personalized adverts to users;

First party cookies are cookies that belong to Aforti and that Aforti places on your Device;

Third party cookies are cookies that another party places on your Device through Aforti's website. These include cookies from external analytics services which help us to understand the use of our website, or are used for advertising or tracking purposes.

4.   <u>Why does the legislation allow us to process your Cookies?</u>

The processing of your cookies by us is made on a legal basis. As per the applicable legislation, we can process your cookies or similar technologies, based on the following grounds:

(i)   based on the applicable legal provisions, for strictly necessary cookies and for cookies used for the sole purpose of carrying out the transmission of a communication;

(ii)   based on your consent, for all other types of cookies.

5.   <u>How long will cookies be stored on your computer?</u>

The length of time that a cookie remains on your Device may vary significantly and depends on whether it is a "persistent" or "session" cookie. See also the section 10 on how to control cookies for more information on removing them before they expire.

6.   <u>What type of information are stored and accessed through cookies?</u>

Cookies store information in small text file that allows the website to recognize the browser. The webserver will recognize the browser until the cookie expires or is erased.

Cookies store important information that enhance the navigation experience on the Internet.

7.   <u>Why do we use cookies?</u>

Aforti's website uses both first party cookies and third-party cookies. These cookies are used for security purposes, to improve the use and the functionality of our website, for authentication of users, to facilitate navigation, to display information more effectively, and to better serve you with more tailored information. We may also use cookies to gather statistical information about the usage of the website in order to continually improve the design and functionality, to understand how visitors use the website, and to assist us with resolving questions regarding the website.

We will not use cookies for automated decision-making processes or for creating profiles.

8.   <u>What cookies do we use?</u>

Essential or strictly necessary cookies are essential for the running of our website. Without these cookies, parts of our website do not operate correctly. These cookies do not track where you have been on the internet and do not remember preferences beyond your current visit and do not gather information about you that could be used for marketing purposes. These cookies are usually session cookies which will expire when you close your browsing session. Accordingly, we are not

asking you for your specific consent for those cookies.

Functionality cookies, including geotargeting cookies are used to increase the usability of our website by remembering your choices (e.g. language, country, region, login, and so on). For instance, we will recognize your user name and remember how you customized the website and services, for example by adjusting text size, fonts, languages, currency chosen for a transaction, authentication details, acceptance of cookies and other parts of web pages that are alterable, and provide you with the same customization during future visits.

Performance cookies collect data on the performance of a website such as the number of visitors, the time spent on the website and error messages. Web analytics services may be designed and operated by third parties. The information provided by these cookies allows us to analyze patters of user behavior and we use this information to enhance user experience or identify areas of the website which may require maintenance. The information is anonymous (i.e. it cannot be used to identify you and does not contain personal information such as your name and email address) and it is used for statistical purposes.

Statistical cookies allow us to customize this website to visitor requirements. We also measure the number of visits, the number of pages viewed, what visitors do on the site and how often they return to it. Our website uses Google Analytics for statistical purposes. However, your IP address has been abbreviated to guarantee your anonymity. We use these data to compile traffic analysis statistics that can be used to improve the site on the basis of the success of a particular page.

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The table below contains a list of different type of cookies that may be used on our website, together with information regarding the storage period for each type of cookie used, their type, their source (if they are first or third party) and whether they are transferred or not outside the EU/EEA:

Name of cookie	Type of cookie	Description	Is it necessary?	Who controls the information?	Expiry period	Type of information
_ga	user-input	Third-party (Google Analytics) More:https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage	No (for statistics only)	Third-party; Google LLC (outside the EU), Aforti Holding Marketing Department	2 years	Id number
_gid	user-input	Third-party (Google Analytics) More:https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage	No (for statistics only)	Third-party; Google LLC (outside the EU), Aforti Holding Marketing Department	24 hours	Id number
_gat	user-input	Third-party (Google Analytics) More:https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage	No (for statistics only)	Third-party; Google LLC (outside the EU), Aforti Holding Marketing Department	1 minute	Id number
aforti-exchange	authentication	Session id cookie. Keeps user logged in	Yes	Website	Session cookie	Id number
_csrf-aforti-exchange	user centric security	Cross-site request forgery protection token. More: https://www.yiiframework.com/doc/guide/1.1/en/topics.security	Yes (for security reasons)	Website	Session cookie	Token
_languag	user interface	Remembers user selected language	NO (for user	Website	30 days	Language

e	customization		preferences)			code
CookieConsentModel	user interface customization	Remembers that Cookies Policy bar has been hidden	NO (for user preferences)	Website	1 year	Boolean
ae-id-hash	Authentication (but not just for the duration of a session)	Description: Token that identifies the registered user before logging in	No (for user tracking only)	Website, Aforti Exchange Operational Users	1 year	Id hash
_identity-frontend	authentication	Cookie-based login.	No (allows the user to log in without entering a password)	Website	1 month	Id number and authorisation key

9.   Why are cookies important for the internet?

Cookies are the central focus of the Internet's efficient operation, helping to generate a friendly browsing experience and tailored to the preferences and interests of each user. Denying or disabling cookies can make some sites impossible to use.

Denying or disabling cookies does not mean you will not receive online advertising - but only that it will no longer be able to keep track of your preferences and interests highlighted by your browsing behavior.

Examples of important uses of cookies (which do not require authentication of a user through an account):

(i)   Offers tailored to users' interests - password retention, language preferences (e.g., display of Romanian search results);

(ii)   Provide more relevant advertising for the user;

(iii)   Measurement, optimization, and analytics features - such as confirming a certain level of traffic on a website, what type of content is viewed, and how a user reaches a website (examples - through search engines, directly from other websites, etc.).

Websites run these analyzes of their use to improve sites for the benefit of users.

10.   How can you manage or opt out of cookies?

You can control and manage cookies in various ways. You can set your browser to accept or reject all, or certain, cookies. If you accept the use of all cookies, it will allow you to use all the functions of the website, without restrictions, but please keep in mind that removing or blocking cookies it can negatively impact your user experience and parts of our website may no longer be fully accessible. If you block the use of all cookies, first party cookies and third party cookies will be deactivated, but Aforti cannot, however, erase third party cookies. For erasing third party cookies, you can access the settings of your browser. For instructions on how to manage cookies, please read the 'Help' section of your browser or by accessing the following website www.aboutcookies.org.

For details on what your browser offers and how to configure your browser according to your choices, please go to the "Help" menu or other dedicated section of your internet browser. By way of example:

(i)   Mozilla   Firefox: https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer

(ii)   Internet   Explorer: https://support.microsoft.com/en-gb/help/278835/how-to-delete-cookie-files-in-internet-explorer

(iii)   Google Chrome: https://support.google.com/chrome/answer/95647?hl=en

(iv)   Safari: http://safari.helpmax.net/en/saving-time/blocking-content/

(v)   Opera: http://help.opera.com/Linux/9.22/en/cookies.html

11.   <u>Security issues</u>

For security purposes, data passed between the web server and the browser in SSL encrypted and therefore, Aforti has implemented specific measures for protecting your personal data stored in cookies.

Cookies are installed through the request issued by a webserver to a browser (e.g. Internet Explorer, Google Chrome, Opera, Mozilla Firefox, Safari etc.) and are completely passive – they do not contain software programs, viruses, spyware and cannot access the information stored on the user's hard drive. Cookies do dot consist of pieces of code, so they cannot be executed, nor can auto-execute.

Cookies can still be used for negative purposes. Since they store information about your preferences and browsing history of users, both on a particular site and several other sites, cookies can be used as a form of Spyware.

Because through cookies information is constantly being sent between the browser and the website, in both ways, if an unauthorized person intercepts the flow of data, the information stored in cookies can be intercepted. Although rare, this can happen if the browser connects to the server through an unencrypted network (for example, an unsecured WiFi connection).

Other attacks based on cookies imply incorrect cookies settings on servers. If a website does not require the browser to use only encrypted channels, unauthorized persons can use this vulnerability in order to deceive the browser in order to send information through unsecured channels. The information is then used by the unauthorized persons for purposes to access various websites.

It is important to be aware in choosing the best method for protecting your personal information.

Generally browsers have integrated privacy settings that provide different levels of acceptance of cookies, validity and automatically deleted after the user visited a particular site.

Here are some tips that can help you navigate effortlessly with cookies:

(i)   Customize your cookie browser settings to reflect a comfortable level for your cookie security;

(ii)   If you share the computer access with another person, you can consider setting your browser to delete individual browsing data each time you close your browser. This is a way to access sites that place cookies and delete any visitor information when you close the

browsing session;

(iii)   Install and constantly update your anti-spyware applications;

(iv)   Many of the applications for detecting and preventing spyware include detecting attacks on sites. This prevents the browser from accessing websites that could exploit browser vulnerabilities or download dangerous software;

(v)   Make sure your browser is always up-to-date. Many of the cookies-based attacks are exploited by exploiting the weaknesses of older browser versions.

12.   <u>Further information and contact details</u>

This website is owned and operated by Aforti Exchange Romania SA.

We are registered in Romania under registration number J40/10043/2017, and our registered office is at 4B Gara Herastrau Street, 10th floor, District 2, Bucharest, Romania.

Please contact Aforti's Data Protection Officer if you would like more information on the cookies that we use and their purposes:

Data Protection Officer - Michał Zygmunt

e-mail: dataprotection@afortiexchange.ro

13.   <u>Amendments to this Cookie Policy</u>

Aforti reserves the right to amend the Cookie Policy when it is required by the provisions of law or by changes introduced to Aforti's website or to its Platform or is otherwise deemed necessary by Aforti. Aforti shall inform you on the changes and the date on which they become effective, in particular, by publishing a notification on our website. Therefore, we strongly recommend that you visit our page regularly in order to be informed with regard to any updates made to this Policy.

In case you have provided us with your contact details and you have authorized us to contact you, we will inform you if this Cookie Policy has been significantly modified.

The date indicated below is the effective date for the Cookie Policy in its most recent version.

Of: 11th March 2019