

# COOKIE POLICY

*Effective Date: March 16, 2026*

*Last Updated Date: March 16, 2026*

PLEASE READ THIS COOKIE POLICY CAREFULLY. IT EXPLAINS HOW COREACCESS SOLUTIONS S.A. USES COOKIES AND SIMILAR TECHNOLOGIES IN CONNECTION WITH YOUR ACCESS TO AND USE OF OUR PLATFORM AND SERVICES. BY CONTINUING TO USE THE PLATFORM, YOU ACKNOWLEDGE THAT YOU HAVE READ AND UNDERSTOOD THIS COOKIE POLICY.

## **1. Introduction**

COREACCESS SOLUTIONS S.A. ("COREACCESS", "we", "us", or "our") is a company incorporated under the laws of the Republic of Panama, with registration number 155771915 and registered address at World Trade Center, 7th Floor, 53E Street, Marbella, Bella Vista, Panama City, Republic of Panama.

We operate a digital platform and provide access to a range of digital asset-related services, software, infrastructure, and technology services, including onboarding, account-related, wallet-related, transaction-related, API, dashboard, administrative, informational, support, and related digital services (collectively, the "Services"). The Services are accessible through our Website and any associated applications, interfaces, or platforms (collectively, the "Platform").

This Cookie Policy ("Policy") explains what cookies and similar technologies are, how we use them on the Platform, the purposes for which we use them, and how you can manage your preferences. This Policy should be read together with our Privacy Policy, and our Terms of Use.

If you have any questions about our use of cookies or similar technologies, please contact us using the details provided in Section 14.

## **2. Scope of this Cookie Policy**

This Policy applies to all cookies and similar technologies deployed on or through the Platform, including those placed by COREACCESS directly and those placed by third-party service providers acting on our behalf or independently in connection with the Platform.

This Policy applies to all visitors to the Platform, including registered users, prospective users, and any other individuals who access the Platform, regardless of their jurisdiction of residence.

This Policy does not apply to the cookie or tracking practices of third-party websites, applications, or services that may be linked to or accessible from the Platform. Such third parties operate under their own cookie and privacy notices, for which COREACCESS is not

responsible. We encourage you to review the cookie and privacy notices of any third-party services you access.

### **3. What Cookies and Similar Technologies Are**

#### **3.1 Cookies**

Cookies are small text files that are placed on your device (computer, smartphone, tablet, or other internet-enabled device) when you visit a website or use an online platform. Cookies allow the website or platform to recognise your device, remember certain information about your visit, and perform various functions that enhance your experience.

Cookies may be set by the operator of the website or platform you are visiting ("first-party cookies") or by third parties whose services are integrated into the website or platform ("third-party cookies"). Cookies may be stored on your device for the duration of a single browsing session ("session cookies") or for a longer period ("persistent cookies").

#### **3.2 Similar Technologies**

In addition to cookies, we and our third-party service providers may use other technologies that function in a similar manner or that collect similar information. These may include, without limitation:

- Pixels and web beacons: small transparent image files or code snippets embedded in web pages or emails that can be used to track user interactions, measure engagement, or confirm delivery of communications;
- Tags and scripts: code embedded in web pages or applications that may collect information about user behaviour, device characteristics, or interactions with the Platform;
- Software development kits ("SDKs"): software components integrated into applications that may collect device and usage information;
- Local storage and session storage: browser-based storage mechanisms that allow data to be stored on your device beyond the scope of a single cookie;
- Device identifiers: unique identifiers associated with your device or browser that may be used to recognise your device across sessions or platforms;
- Analytics and tracking tools: third-party tools and services that collect and analyse information about how users interact with the Platform;
- Session replay and heatmap technologies: tools that may record or reconstruct user interactions with the Platform for diagnostic or analytical purposes, where applicable;
- Other similar recognition or tracking technologies that may be developed or deployed from time to time.

References to "cookies" in this Policy should be understood to include all such similar technologies unless the context otherwise requires.

### **4. Types of Cookies We Use**

We may use the following categories of cookies and similar technologies on the Platform. The specific cookies deployed may vary depending on the features and functionality of the Platform at any given time, and we may update the cookies we use from time to time.

#### **4.1 Strictly Necessary Cookies**

Strictly necessary cookies are essential for the Platform to function and cannot be disabled without significantly impairing your ability to use the Platform. These cookies do not require your consent where permitted by applicable law, as they are necessary to provide the services you have requested.

Strictly necessary cookies may be used for purposes including:

- Enabling core Platform functionality and navigation;
- Authentication, login, and session management;
- Maintaining the security and integrity of the Platform;
- Remembering items in your session or account state;
- Facilitating access to secure areas of the Platform;
- Enabling compliance-related and onboarding workflows;
- Load balancing and server-side session management.

#### **4.2 Functional and Preference Cookies**

Functional and preference cookies allow the Platform to remember choices you make and provide enhanced, personalised features. These cookies may be set by us or by third-party providers whose services we have integrated into the Platform.

Functional and preference cookies may be used for purposes including:

- Remembering your language, region, or display preferences;
- Storing your account settings and customisation choices;
- Remembering whether you have accepted or declined certain notices or prompts;
- Enabling certain interactive features of the Platform.

#### **4.3 Performance and Analytics Cookies**

Performance and analytics cookies collect information about how visitors use the Platform, including which pages are visited most frequently, how users navigate between pages, and whether users encounter any errors. This information is used to improve the performance, usability, and functionality of the Platform. The information collected by these cookies is typically aggregated and does not directly identify individual users.

Performance and analytics cookies may be used for purposes including:

- Measuring website traffic, usage patterns, and user engagement;
- Analysing how users interact with the Platform and its features;
- Identifying technical issues, errors, and performance bottlenecks;
- Conducting A/B testing and feature evaluation;
- Supporting internal reporting, diagnostics, and business analytics.

#### **4.4 Security Cookies**

Security cookies are used to support the security and integrity of the Platform and to detect and prevent fraudulent, unauthorised, or malicious activity. These cookies may work in conjunction with our security infrastructure and third-party security providers.

Security cookies may be used for purposes including:

- Detecting and preventing fraud, bot activity, and automated abuse;
- Supporting multi-factor authentication and account verification flows;
- Monitoring for suspicious or anomalous activity;
- Protecting against cross-site request forgery ("CSRF") and similar attacks;
- Supporting compliance monitoring and audit logging.

#### **4.5 Advertising and Targeting Cookies (Where Applicable)**

Where applicable and to the extent permitted by applicable law, we or our third-party partners may use advertising or targeting cookies to deliver content or communications that may be relevant to your interests, to measure the effectiveness of marketing campaigns, or to limit the frequency with which you see certain content. Such cookies may track your activity across different websites or platforms.

We will only deploy advertising or targeting cookies where we have a lawful basis to do so under applicable law, which may include your consent. You may manage your preferences in relation to such cookies as described in Sections 9 and 10.

#### **4.6 Third-Party Cookies**

Some cookies on the Platform may be placed by third-party service providers whose services are integrated into or accessible through the Platform. These third-party cookies are subject to the privacy and cookie notices of the relevant third parties. Please refer to Section 11 for further information on third-party services and embedded technologies.

### **5. Purposes for Which We Use Cookies**

We may use cookies and similar technologies for the following purposes, subject to applicable law and, where required, your consent:

- Enabling and maintaining core website and Platform functionality;
- Authentication, session management, and secure account access;
- Security monitoring, fraud detection, and prevention of unauthorised access;
- Supporting account access, onboarding, and user verification workflows;
- Remembering your preferences, settings, and customisation choices;
- Improving Platform performance, reliability, and user experience;
- Conducting analytics, diagnostics, and statistical analysis of Platform usage;
- Measuring website traffic, engagement, and usage patterns;
- Maintaining the integrity and availability of the Services;
- Troubleshooting, debugging, and resolving technical issues;
- Supporting compliance, audit, and operational monitoring activities;
- Managing marketing and communications preferences, where applicable;
- Delivering relevant content or communications, where applicable and permitted by law;
- Any other purpose described to you at the time of collection or for which you have provided your consent.

### **6. First-Party and Third-Party Cookies**

#### **6.1 First-Party Cookies**

First-party cookies are cookies set directly by COREACCESS when you visit or use the Platform. These cookies are used to support the core functionality, security, and performance of the Platform, and to provide you with a consistent and functional experience.

## **6.2 Third-Party Cookies**

Third-party cookies are cookies set by third-party service providers whose technologies or services are integrated into or accessible through the Platform. These third parties may include, without limitation:

- Analytics and performance measurement providers;
- Cloud hosting, content delivery network ("CDN"), and infrastructure providers;
- Security, anti-fraud, and bot-detection vendors;
- Identity verification, KYC, and compliance service providers;
- Customer support and communications platforms;
- Payment, banking, wallet, and infrastructure partners;
- Marketing, advertising, and communications vendors, where applicable;
- Embedded content or functionality providers.

Third-party cookies are governed by the privacy and cookie notices of the relevant third parties, and COREACCESS does not control the data practices of such third parties. We encourage you to review the privacy and cookie notices of any third-party services whose cookies may be present on the Platform.

We take reasonable steps to ensure that third-party service providers engaged by us process data in accordance with applicable law and our instructions. However, we are not responsible for the independent data practices of third parties.

## **7. Legal Basis and Consent**

The legal basis on which we use cookies and similar technologies depends on the type of cookie, the purpose for which it is used, and the applicable law in your jurisdiction.

### **7.1 Strictly Necessary Cookies**

Where permitted by applicable law, strictly necessary cookies may be deployed without your prior consent, as they are essential to the provision of the services you have requested and to the operation of the Platform. These cookies cannot be disabled without materially impairing the functionality of the Platform.

### **7.2 Other Cookies**

For cookies that are not strictly necessary, we will rely on one or more of the following legal bases, depending on the applicable law and the nature of the processing:

- Consent: where required by applicable law, we will obtain your consent before deploying non-essential cookies. You may provide or withdraw your consent through our cookie banner, consent management platform, or preference centre;
- Legitimate interests: where permitted by applicable law, we may rely on our legitimate interests in operating, securing, and improving the Platform as a basis for deploying certain cookies, where such interests are not overridden by your interests or rights;

- Contractual necessity: where processing is necessary to perform our obligations under our Terms of Use or to take steps at your request prior to entering into an agreement.

### **7.3 Withdrawal of Consent**

Where we rely on your consent as the legal basis for deploying cookies, you may withdraw your consent at any time by adjusting your preferences through our cookie banner or preference centre at Cookie Settings, or by adjusting your browser settings as described in Section 10. Please note that withdrawal of consent does not affect the lawfulness of any processing carried out prior to withdrawal, and may affect the functionality of the Platform.

The legal bases described above are presented for informational purposes and reflect internationally recognised data protection principles. The specific legal basis applicable to any given cookie will depend on the nature of the cookie, the purpose for which it is used, and applicable law in your jurisdiction.

## **8. Cookie Retention and Duration**

The duration for which a cookie remains on your device depends on whether it is a session cookie or a persistent cookie.

### **8.1 Session Cookies**

Session cookies are temporary cookies that are stored on your device only for the duration of your browsing session. They are automatically deleted when you close your browser or end your session. Session cookies are typically used for authentication, session management, and core Platform functionality.

### **8.2 Persistent Cookies**

Persistent cookies remain on your device after you close your browser, for a period determined by the cookie's expiry date or until you delete them manually. Persistent cookies are used for purposes such as remembering your preferences, supporting analytics, and enabling security features across sessions.

The specific retention period for each cookie will depend on its purpose, the provider that set it, and applicable legal or operational requirements. Retention periods may range from a single session to several years. Where we are required by applicable law to retain certain data collected through cookies for compliance, audit, or record-keeping purposes, we will retain that data for the minimum period required.

## **9. How You Can Manage Your Cookie Preferences**

You have a number of options for managing your cookie preferences. Please note that restricting or disabling certain cookies may affect the functionality of the Platform and your ability to access certain features of the Services.

### **9.1 Cookie Banner and Preference Centre**

Where we operate a cookie banner or consent management platform, you may accept, decline, or customise your cookie preferences when you first visit the Platform, or at any time

thereafter by accessing our cookie preference centre at [Cookie Settings](#). Please note that strictly necessary cookies cannot be disabled through the preference centre, as they are essential to the operation of the Platform.

## **9.2 Browser Settings**

Most web browsers allow you to manage cookies through your browser settings. You may be able to: refuse all or certain types of cookies; delete cookies that have already been placed on your device; receive a notification when a cookie is set; or browse in private or incognito mode, which may limit certain types of cookie storage.

Please note that the above links are provided for convenience only and may change over time. We are not responsible for the content of third-party websites.

## **9.3 Mobile and Device Settings**

If you access the Platform through a mobile device or application, you may be able to manage certain tracking preferences through your device settings, including advertising identifier settings and location permissions. Please refer to the settings menu of your device or operating system for further information.

## **9.4 Opt-Out Tools**

Certain third-party analytics and advertising providers may offer opt-out tools or browser add-ons that allow you to limit the collection of data through their technologies. Where applicable, information about such opt-out tools may be available through the privacy or cookie notices of the relevant third parties.

Please be aware that if you disable or delete cookies, some features of the Platform may not function correctly, and you may need to re-enter certain information or preferences each time you visit the Platform.

## **10. Browser Controls and Device Settings**

In addition to the options described in Section 9, you may use your browser's built-in controls to manage cookies and similar technologies. Most modern browsers provide settings that allow you to:

- View the cookies currently stored on your device;
- Block all cookies or cookies from specific websites;
- Delete cookies that have already been placed on your device;
- Set your browser to notify you when a cookie is being set;
- Enable private or incognito browsing mode, which may limit certain types of persistent cookie storage.

Please note that browser controls may not be effective in managing all types of tracking technologies, including local storage, device identifiers, or certain server-side tracking mechanisms. For a more comprehensive approach to managing your preferences, we recommend using our cookie preference centre at [\[Cookie Settings Link\]](#) in conjunction with your browser settings.

We do not currently respond to browser-level "Do Not Track" ("DNT") signals. We will honour applicable global privacy signals to the extent required by applicable law.

## **11. Third-Party Services and Embedded Technologies**

The Platform may integrate or interact with third-party services, tools, and technologies that may deploy their own cookies or similar tracking technologies. These third-party services may include, without limitation:

- Analytics and performance measurement providers (e.g., web analytics platforms that collect aggregated usage data);
- Cloud hosting, content delivery network ("CDN"), and infrastructure providers that may use cookies for load balancing, security, or performance purposes;
- Security, anti-fraud, and bot-detection vendors that may use cookies or device fingerprinting to detect and prevent malicious activity;
- Identity verification, KYC, and compliance service providers that may use cookies or similar technologies in connection with onboarding or verification workflows;
- Customer support and live chat platforms that may use cookies to manage support sessions and interactions;
- Communications and email marketing platforms that may use pixels or tracking technologies to measure the delivery and engagement of communications;
- Payment, banking, wallet, and infrastructure partners that may use cookies in connection with transaction processing or account management;
- Social media or marketing platforms, where applicable, that may use cookies or pixels to support advertising or content delivery;
- Embedded content providers whose content may be displayed on or through the Platform.

Each of these third-party providers operates under its own privacy and cookie notices, which govern their data collection and processing practices. COREACCESS does not control the data practices of such third parties and is not responsible for the cookies or tracking technologies they deploy independently.

We take reasonable steps to ensure that third-party service providers engaged by us process data in accordance with applicable law and our instructions. However, where third parties deploy cookies or tracking technologies independently or in accordance with their own terms, you should refer to the relevant third party's privacy and cookie notices for further information.

## **12. Children and Sensitive Use**

The Services and the Platform are not directed to, and are not intended for use by, individuals under the age of eighteen (18) years, or such other minimum age as may be required by applicable law in the relevant jurisdiction. We do not knowingly use cookies or similar technologies to track or collect personal data from minors.

If you believe that we may have inadvertently collected data from a minor through cookies or similar technologies, please contact us immediately using the details provided in Section 14.

We do not use cookies or similar technologies to process special categories of personal data (such as health data, biometric data, or data revealing racial or ethnic origin) except to the extent strictly necessary and permitted by applicable law.

### **13. Changes to this Cookie Policy**

We may update or amend this Policy from time to time to reflect changes in our use of cookies or similar technologies, changes to the Platform or Services, applicable law, or for other operational, legal, or regulatory reasons. Any changes will become effective upon posting of the updated Policy to the Platform, as indicated by the updated date at the top of this Policy.

Where required by applicable law, or where changes are material, we will provide you with advance notice of such changes using the contact information you have provided or through other appropriate means, such as a notice on the Platform or an updated cookie banner.

Your continued access to or use of the Platform following the effective date of any amendment constitutes your acknowledgement of the updated Policy. We encourage you to review this Policy periodically to stay informed about our use of cookies and similar technologies.

If you do not agree with any changes to this Policy, you should discontinue your use of the Platform and adjust your cookie preferences as described in Sections 9 and 10.

### **14. Contact Details**

If you have any questions, concerns, or requests regarding this Policy or our use of cookies and similar technologies, please contact us at:

#### **COREACCESS SOLUTIONS S.A.**

World Trade Center, 7th Floor, 53E Street

Marbella, Bella Vista, Panama City

Republic of Panama

Email: [Email]

We will endeavour to respond to all legitimate requests within a reasonable timeframe and in accordance with applicable law.