



## COOKIE POLICY

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## **1. Introduction**

This Cookie Policy explains how DPRG IM Ltd with Registration Number: HE433850, (“the Company”, “we”, “our”, or “us”) uses cookies and similar technologies on our website. It is intended to inform visitors (“you”, “users”) about what cookies are, which types we use, why we use them, and how you can control them.

We are committed to transparency and compliance with the General Data Protection Regulation (EU) 2016/679 (“GDPR”), the ePrivacy Directive 2002/58/EC, the Law 125(I)/2018, and the Digital Operational Resilience Act (DORA – Regulation (EU) 2022/2554).

## **2. What Are Cookies?**

Cookies are small text files that are stored on your computer, smartphone, tablet, or other device when you visit a website. They allow the website to recognise your device and remember certain information about your visit, such as your preferences or past interactions.

Cookies serve multiple functions:

- Enabling website features and navigation
- Ensuring security of sessions and transactions
- Improving user experience
- Generating aggregated usage statistics
- Supporting ICT and digital operational resilience (under DORA)

## **3. What Types of Cookies Do We Use?**

### **3.1. Strictly Necessary Cookies**

These cookies are essential for the functioning of our website and cannot be disabled. They are usually only set in response to actions made by you such as logging in, setting privacy preferences, or filling out forms.

Examples:

- Session authentication cookies
- Load balancing and access control
- Cookie consent management tools

Legal basis: Legitimate interest – website operation and security.

### **3.2. Performance and Analytics Cookies**

These cookies collect anonymised data on how users interact with the website (e.g., page visits, bounce rates, load times). This helps us analyse website traffic and improve performance and usability.

We may use tools like Google Analytics or similar services. Data is aggregated and does not directly identify individuals.

Legal basis: Your consent (opt-in via cookie banner)

### **3.3. Functionality Cookies**

Functionality cookies enable the website to remember choices you make (e.g. language, region, display preferences) and provide enhanced, personalised features.

Disabling these cookies may impact your experience, but the site will still function.

Legal basis: Your consent

### **3.4. Security and ICT Resilience Cookies**

These cookies are used to detect anomalies, block malicious traffic, and ensure compliance with DORA obligations. This includes:

- System health checks
- Monitoring for intrusion or abuse
- Logging errors and audit events

Legal basis: Legal obligation (DORA) and legitimate interest (cybersecurity)

## **4. How Do We Collect Consent?**

When you first visit our website, a cookie banner appears. You can:

- Accept all cookies
- Reject non-essential cookies
- Customise your preferences

You can change or withdraw your consent at any time by clicking the “Cookie Settings” link in the website footer.

Our banner complies with GDPR and ePrivacy requirements for freely given, informed, and specific consent.

## 5. How Long Are Cookies Stored?

### 5.1. Cookie Storage Duration

Cookies may be stored as either:

- Session cookies, which are deleted automatically when you close your browser
- Persistent cookies, which remain stored on your device for a limited period depending on their purpose and technical configuration

You may delete or manage cookies at any time via your browser settings.

### 5.2. Website Usage Data and Cookies

Retained only for as long as necessary to fulfill their purpose (e.g., functionality, analytics, or security), in accordance with browser settings and the Company's Cookie Policy. Duration varies depending on technical settings and user consent preferences.

## 6. How Can You Manage or Disable Cookies?

You can manage or delete cookies directly from your browser settings. Most browsers allow you to:

- View and delete existing cookies
- Block third-party cookies
- Set preferences for specific websites
- Enable notifications before cookies are set

Please note: Disabling certain cookies may affect your ability to access or use some features of our website.

For more information, visit:

- <https://www.aboutcookies.org>
- <https://www.allaboutcookies.org>

## 7. Third-Party Cookies and Tools

We may use third-party services (e.g. Google Analytics, reCAPTCHA, web hosting providers) that may place cookies on your device. These providers are contractually bound to ensure GDPR-compliant processing and may only access anonymised or pseudonymised data.

We do not use third-party advertising, profiling, or behavioural targeting cookies.

## **8. Links to Other Policies**

For more information on how we collect, store, share, or protect your personal data, please refer to our full [Privacy Policy \[link\]](#) which outlines:

- Your data subject rights
- Legal bases for processing
- International transfers and data security measures

## **9. Contact us**

If you have any questions about this Cookie Policy or your personal data rights, you may contact our Data Protection Officer (DPO):

Email: [dpo@dprginvestment.com](mailto:dpo@dprginvestment.com)

Phone: +357 22107000

## **10. Version Control and Approval**

This Cookie Policy is reviewed and approved by the Company's Board of Directors and is subject to periodic review to ensure ongoing compliance with applicable data protection laws, including the General Data Protection Regulation (EU) 2016/679 ("GDPR"), Law 125(I)/2018, CySEC regulatory framework, and the Digital Operational Resilience Act (DORA).

The Company maintains version control to track amendments and ensure transparency and accountability. Any material changes are communicated internally and, where required, externally to relevant stakeholders, including clients and data subjects.

### **Version Control**

Version: 1.0

Approval Date: 14/04/2025

Approved by: Board of Directors, DPRG IM Ltd

