

COOKIE POLICY

Last updated on 10.10.2025

1. SCOPE AND PURPOSE

This Cookie Policy ("**Policy**") is issued by **STOCKENN LLC**, a limited liability company incorporated under the laws of Wyoming, USA with its registered office at 30 N Gould St #47571, Sheridan, WY 82801 ("**Company**," "we," "us," or "our"). It governs the use of cookies and other analogous tracking technologies on our digital platform, including our website and associated services (collectively, the "**Platform**"). This Policy is designed to provide our users ("you" or "**User**") with transparent and comprehensive information regarding the technologies we deploy, their purpose, and the choices available to you.

By continuing to use our Platform after being presented with our cookie banner, you acknowledge that you have been informed of our use of these technologies as described in this Policy.

This Policy is drafted in accordance with applicable data protection legislation, including the General Data Protection Regulation (EU) 2016/679 ("**GDPR**") and the Directive 2002/58/EC on Privacy and Electronic Communications (the "**ePrivacy Directive**").

This Policy is an integral part of our overarching data governance framework and should be read in conjunction with our [\[Privacy Policy link\]](#), which provides further details on how we collect, process, and protect your personal data.

2. DEFINITION OF TRACKING TECHNOLOGIES

For the purposes of this Policy, we use the term "cookies" to refer to a broad range of tracking technologies, including:

HTTP Cookies means small data files placed on your device's browser by our server or third-party servers to enable specific functionality.

Web Beacons (or **Pixels**) means tiny graphic images with a unique identifier, embedded invisibly on web pages or in emails, used to track user activity and engagement.

Scripts means pieces of code embedded in our Platform that are executed on your device to collect information about your interactions.

Local Storage Objects (e.g., HTML5 Local Storage) means a technology that allows data to be stored locally within your browser without an expiration date, persisting after the browser is closed.

3. LEGAL BASIS FOR THE USE OF COOKIES

Our use of cookies and similar technologies is governed by the EU's General Data Protection Regulation (GDPR) and the Directive on Privacy and Electronic Communications (e-Privacy Directive). Our deployment of cookies is predicated on a valid legal basis, as follows:

- **Strictly Necessary Cookie.** We deploy these cookies based on our legitimate interest (Art.6(1)(f)GDPR) to provide the essential functionality of our Platform and to ensure its security and integrity. These cookies are exempt from the prior consent requirement under the e-Privacy Directive as they are essential for the transmission of a communication or for providing a service explicitly requested by you.
- **All Other Cookies** (e.g., Performance, Functional, Targeting). In accordance with the e-Privacy Directive, we deploy these cookies exclusively on the basis of your explicit, informed, and freely given prior consent. The standard for this consent is defined by the GDPR (Art.6(1)(a)GDPR). This means we will not place these cookies on your device without your affirmative approval, which you can manage at any time via our consent management tool.

Below is a more detailed breakdown of these consent-based cookie categories:

Performance and Analytics Cookies. These cookies collect information about how you interact with our Platform, such as which pages you visit most, how much time you spend on them, and any error messages you encounter. The data collected is often aggregated and pseudonymized, and we use it solely to analyze and improve the performance and user experience of our services.

Functional Cookies. These cookies allow our Platform to remember choices you make (such as your user name, language, or the region you are in) and provide enhanced, more personal features. For example, they can be used to remember your login details or display content tailored to your preferences. While they significantly improve your experience, they are not essential for the core functionality of the service.

Targeting and Advertising Cookies. These cookies are used to deliver advertisements that are more relevant to you and your interests. They track your browsing habits across websites to build a profile, which is then used by us or our third-party advertising partners to show you targeted ads on other sites. They work by uniquely identifying your browser and device, but do not store directly identifiable personal information like your name.

Your consent for these cookies must be a clear, affirmative act. You have the right to grant, refuse, or withdraw your consent at any time with the same ease. Our consent management tool provides you with granular control to accept or reject each category of non-essential cookies.

4. CLASSIFICATION AND USE OF COOKIES

We classify the cookies used on our Platform into the categories detailed in the table below. For each category, we have specified the purpose and provided a placeholder for you to detail the specific technologies deployed.

Category	Description & Purpose	Legal Basis for Processing	Specific Technologies Used (Examples)
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Strictly Necessary Technologies	These are indispensable for the operation of the Platform. They enable core functionalities such as user authentication, session management, secure transactions, and compliance with security requirements. Disabling these may render significant portions of the Platform inoperable.	Legitimate Interest (Art. 6(1)(f) GDPR) / Performance of a Contract (Art. 6(1)(b) GDPR)	Name: [e.g., auth_token] Provider: [e.g., Our Platform] Purpose: [e.g., Securely maintains user login state across pages.] Duration: [e.g., Session] Name: [e.g., cf_bm] Provider: [e.g., Cloudflare] Purpose: [e.g., Bot detection and mitigation to protect site integrity.] Duration: [e.g., 30 minutes]
Performance & Analytics Technologies	These technologies are used to collect aggregated, often anonymized, data on user interaction with our Platform. This includes metrics such as page views, session duration, referral sources, and load times. The insights derived are used exclusively for statistical analysis to improve the performance, usability, and architecture of the Platform.	Consent (Art. 6(1)(a) GDPR)	Name: [e.g., _ga, _gat] Provider: [e.g., Google Analytics] Purpose: [e.g., To generate statistical data on how the visitor uses the website.] Duration: [e.g., 2 years]
Functional Technologies	These technologies enable the Platform to provide enhanced personalization and functionality by remembering your preferences and choices. This may include your username, preferred language, region, or customized interface settings. Their purpose is to create a more tailored	Consent (Art. 6(1)(a) GDPR)	Name: [e.g., language_preference] Provider: [e.g., Our Platform] Purpose: [e.g., Stores the user's selected language to display the site consistently.] Duration: [e.g., 1 year]

	and seamless user experience.		
Targeting & Advertising Technologies	These technologies are designed to track your activity across the Platform and other websites to build a profile of your interests. This profile is used to deliver advertising content that is more relevant to you. These may be set by us or by our third-party advertising partners.	Consent (Art. 6(1)(a) GDPR)	<p>[If you do not use these, state: "The Company does not currently deploy Targeting or Advertising Technologies." Otherwise, populate this section]</p> <p>Name: [e.g., _fbp]</p> <p>Provider: [e.g., Meta (Facebook)]</p> <p>Purpose: [e.g., To deliver a series of advertisement products such as real-time bidding from third-party advertisers.]</p> <p>Duration: [e.g., 3 months]</p>

5. THIRD-PARTY COOKIES AND INTERNATIONAL DATA TRANSFERS

Certain Tracking Technologies on our Platform are operated by third parties. We undertake reasonable due diligence in selecting these third-party providers; however, we do not control their data collection or processing activities. The placement and use of such third-party cookies are subject to their own privacy policies, and we disclaim any liability arising from the actions or omissions of these third parties.

Where the use of such technologies involves the transfer of personal data to a country outside the European Economic Area (EEA) not deemed to have an adequate level of data protection, we shall ensure such transfers are legitimized through appropriate safeguards under Chapter V of the GDPR. These safeguards may include the use of Standard Contractual Clauses (SCCs) as approved by the European Commission, supplemented by a Transfer Impact Assessment (TIA) and additional technical and organizational measures to ensure a level of data protection essentially equivalent to that guaranteed within the EEA.

6. USER RIGHTS AND CONSENT MANAGEMENT

You have granular control over the non-essential cookies placed on your device. Upon your initial visit, our Consent Management Platform (CMP) will be displayed, allowing you to accept, reject, or customize your cookie preferences. You may modify these settings or withdraw your consent at any time by accessing the [Link to Cookie Settings/Privacy Dashboard](#).

The withdrawal of consent shall not affect the lawfulness of any processing based on consent before its withdrawal.

In addition to our CMP, you can manage cookie preferences directly within your web browser. Most browsers allow you to block or delete cookies. Please note that a universal "**Do Not Track**" (DNT) signal is not yet uniformly recognized, and we

do not currently respond to DNT signals. For detailed instructions, please consult the help documentation for your browser.

Please be advised that refusing consent or disabling certain categories of cookies may materially impact the functionality and your experience of the Platform. While core services will remain accessible, features related to personalization, performance analytics, and enhanced functionality may be degraded or unavailable.

7. DATA RETENTION (AND RENUMBER SUBSEQUENT ARTICLES)

7.1. The retention period for data collected via cookies is determined by the nature of the cookie. Session cookies are deleted automatically upon the termination of your browsing session. Persistent cookies remain on your device for a pre-defined period as specified in the table in Article 4 of this Policy, or until you manually delete them.

7.2. Data collected that qualifies as personal data shall be retained only for as long as necessary to fulfill the purposes outlined in this Policy, after which it will be duly anonymized or deleted in accordance with our data retention schedules.

8. POLICY AMENDMENTS

We reserve the right to amend this Policy at any time to reflect changes in technology, legal requirements, or our operational practices. Any amendments will be effective immediately upon posting of the updated Policy on our Platform. We will use reasonable efforts to notify you of any material changes.

9. CONTACT INFORMATION

For any inquiries, requests, or concerns regarding this Cookie Policy or our data practices, please contact our privacy team or Data Protection Officer (if appointed) at:

STOCKENN LLC

Company's Registered Address: 30 N Gould St #47571, Sheridan, WY 82801

Email Address for Privacy Inquiries: [**legal@stockenn.com**](mailto:legal@stockenn.com)