

# COOKIE POLICY

**Effective Date:** 22 Feb 2025

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## 1. Introduction

Halo Digital FZ LLC ("Company," "we," "us," or "our") uses cookies and similar technologies to enhance user experience, analyze website traffic, and provide personalized content. This Cookie Policy explains how we use cookies, the types of cookies we collect, and how you can manage your cookie preferences.

This policy is in compliance with the Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (UAE PDPL) and the California Consumer Privacy Act (CCPA). By using our website, you consent to our use of cookies as described in this policy.

## 2. What Are Cookies?

Cookies are small data files stored on a user's device (computer, tablet, smartphone) when they visit a website. These files contain information that helps websites recognize returning users, remember preferences, enhance functionality, and provide a more personalized experience. Cookies can also be used for security purposes, performance analytics, and targeted advertising.

Cookies are classified into the following categories:

- First-party cookies – Cookies set directly by Halo Digital and used for core website functionality, authentication, and user experience enhancement.
- Third-party cookies – Cookies set by external service providers, such as analytics platforms, advertising networks, and social media integrations, to track user interactions across different websites.

Cookies may have different lifespans:

- Session cookies – Temporary cookies that expire when the user closes their browser.
- Persistent cookies – Stored on the device for a defined period or until manually deleted by the user.

## 3. Types of Cookies We Use

We use the following categories of cookies:

### 3.1 Essential Cookies (Strictly Necessary)

These cookies are fundamental for the proper operation of our website and cannot be disabled. They are typically set in response to user actions, such as logging in or submitting a form. Without these cookies, essential website features may not function correctly.

Examples of essential cookies:

- **Authentication and session management.** Enables users to log in and stay authenticated while navigating the website.
- **Security and fraud prevention.** Helps detect and prevent unauthorized access or malicious activity.
- **Load balancing.** Distributes web traffic efficiently across multiple servers to optimize website performance and stability.
- **Cookie consent preferences.** Stores user preferences regarding the acceptance or rejection of non-essential cookies.

Since these cookies are strictly necessary for website functionality, they do not require user consent under data protection laws, including UAE PDPL and CCPA.

### 3.2 Functional Cookies

These cookies improve user experience by remembering preferences and settings, allowing for a more customized and seamless browsing experience.

Examples of functional cookies:

- **Language and location settings.** Stores user language preferences and geographic region to display localized content.
- **User session history.** Remembers user preferences, such as selected themes, layout settings, or recently viewed pages.
- **Live chat functionality.** Enables customer support features and saves chat history for continuity.
- **Form autofill.** Saves form inputs for convenience when returning to a page.

Users can choose to disable functional cookies through browser settings; however, doing so may result in a less personalized experience.

### 3.3 Performance & Analytics Cookies

These cookies collect data on website usage to help us understand user behavior, measure performance, and improve our services. They do not store personally identifiable information but aggregate data for statistical analysis:

Examples of performance and analytics cookies:

- **Google Analytics.** Tracks page views, traffic sources, and user interactions to analyze website effectiveness.
- **Heatmaps and session recordings.** Identifies areas of interest by tracking cursor movements and clicks.
- **Error reporting and debugging tools.** Helps identify and fix technical issues on the website.
- **A/B testing tools.** Compares different versions of website elements to optimize user experience.

Users may opt out of performance and analytics cookies by adjusting their cookie preferences on our website or through Google's opt-out tools.

### 3.4 Advertising & Targeting Cookies

These cookies track user activity across websites and digital platforms to deliver personalized advertisements based on browsing behavior. They are commonly used by advertising networks and social media platforms.

Examples of advertising and targeting cookies:

- **Google Ads & Display Network.** Tracks conversions and user interactions for retargeting campaigns.
- **Facebook Pixel.** Monitors website visits and user actions to optimize Facebook and Instagram ad campaigns.
- **LinkedIn Insight Tag.** Measures LinkedIn ad performance and audience engagement.
- **Behavioral tracking tools.** Analyzes user preferences to display relevant ads across third-party websites.

Users can opt out of targeted advertising through platforms like Network Advertising Initiative (NAI), Digital Advertising Alliance (DAA), or specific ad settings in Google, Facebook, and LinkedIn.

## 4. How We Use Cookies

We use cookies to improve functionality, enhance security, analyze performance, personalize user experience, and comply with legal obligations. Below are specific ways in which cookies support our Services:

### 4.1 Enhancing Website Functionality

Cookies ensure a smooth and intuitive user experience by:

- Remembering login credentials to prevent users from having to re-enter details.
- Storing language and region preferences to provide localized content.
- Saving user settings (e.g., dark mode, notification preferences).

- Enabling real-time chat support by keeping session continuity.

## **4.2 Improving Website Performance & Analytics**

To optimize our website and understand visitor behavior, we use cookies to:

- Measure website traffic and identify frequently visited pages.
- Monitor page load speeds and site responsiveness.
- Detect and log technical errors, such as broken links.
- Conduct A/B testing to improve site navigation and layout.

## **4.3 Personalization & Targeted Advertising**

Cookies help tailor content and marketing efforts based on user behavior by:

- Showing recommended content based on previous interactions.
- Enabling targeted ads on platforms like Google, Facebook, and LinkedIn.
- Retargeting users who visited certain pages but didn't complete an action (e.g., signing up or making a purchase).

## **4.4 Security & Compliance**

To protect users and comply with legal requirements, cookies:

- Detect and prevent fraudulent activity, unauthorized logins, and bot traffic.
- Ensure compliance with UAE PDPL and CCPA by storing user consent preferences.
- Maintain audit logs for security and regulatory purposes.

# **5. Legal Basis for Using Cookies**

The legal basis for processing personal data via cookies depends on the nature of the data collected and the applicable regulatory framework. Halo Digital FZ LLC complies with the United Arab Emirates Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (UAE PDPL) and the California Consumer Privacy Act (CCPA), as well as other relevant data protection laws.

## **5.1 Legal Basis under UAE PDPL**

The UAE PDPL requires that organizations process personal data only when there is a clear legal basis. When using cookies, we rely on the following legal justifications:

- **Strictly Necessary Cookies** – These cookies are essential for the operation of our website and do not require user consent under UAE PDPL. They are processed under the legitimate interest of the Company to provide secure and functional online services.

- Functional Cookies – These cookies enhance user experience and require explicit user consent, unless they fall under an exemption for providing requested services.
- Analytics and Performance Cookies – User consent is required before activating these cookies unless data is anonymized and used for purely statistical purposes.
- Advertising and Targeting Cookies – These cookies require explicit, informed, and freely given consent before processing begins. Users must be able to withdraw their consent at any time.

## 5.2 Legal Basis under CCPA

The CCPA classifies cookies as a form of personal data processing and grants users specific rights regarding their data. Under the CCPA:

- Strictly Necessary Cookies – Do not require consent, as they are essential for providing requested services.
- Analytics and Advertising Cookies – Considered "sale" or "sharing" of personal information under CCPA, requiring opt-in or opt-out mechanisms for California residents.
- User Rights Under CCPA:
  - The right to opt out of data collection via advertising cookies.
  - The right to know what personal information is collected and how it is used.
  - The right to request deletion of personal data processed via cookies.

## 5.3 How We Obtain and Manage Consent

In compliance with UAE PDPL and CCPA, we:

- Display a cookie consent banner when users first visit the website, allowing them to accept or decline non-essential cookies.
- Provide granular cookie settings so users can enable or disable specific categories of cookies.
- Store user preferences and allow changes through the website's cookie management tool.
- Offer opt-out options for California residents in accordance with CCPA's "Do Not Sell or Share My Personal Information" requirements.

Users can withdraw their consent at any time through their browser settings or our cookie management panel.

## 6. Managing Cookie Preferences

Users have full control over how cookies are stored and used on their devices. While strictly necessary cookies cannot be disabled as they are essential for website functionality, users may manage, limit, or disable other categories of cookies through the following methods:

## 6.1 Browser Settings

Most web browsers provide settings that allow users to:

- Block all cookies – Prevents any cookies from being stored, but may cause some websites to malfunction.
- Delete existing cookies – Removes previously stored cookies, which may log users out of accounts and reset site preferences.
- Restrict third-party cookies – Allows necessary site functions to work while blocking cookies from external advertising or analytics providers.
- Enable "Do Not Track" (DNT) requests – Sends a signal to websites requesting limited tracking (though compliance varies by site).

*\*Keep in mind that blocking or deleting cookies may affect website performance and limit access to certain features.*

## 6.2 Cookie Banner & Consent Management

When visiting our website for the first time, users are presented with a cookie consent banner, allowing them to:

- Accept all cookies for full functionality.
- Customize cookie settings by selecting only specific categories.
- Reject all non-essential cookies.

Users can modify their cookie preferences at any time through the cookie settings panel available on our website.

## 6.3 Opt-Out of Targeted Advertising & Tracking

For users who wish to disable targeted advertising cookies, the following options are available:

- Ad Preference Tools – Platforms such as Google, Facebook, and LinkedIn allow users to adjust ad personalization settings.
- Global Privacy Control (GPC) – Some browsers support GPC signals that automatically communicate a user's privacy preferences to websites.
- Industry Opt-Out Programs:
  - Network Advertising Initiative (NAI) – Allows users to opt out of targeted ads from participating ad networks.
  - YourAdChoices – Provides tools to manage personalized advertising preferences.

*\* Opting out does not eliminate ads but prevents them from being personalized based on browsing history.*

## 6.4 Mobile & App-Based Tracking

Users who access our Services via mobile devices can:

- Adjust privacy settings on iOS (Apple) or Android (Google) to limit ad tracking.
- Use app permissions to control how apps collect and use cookies and tracking data.

## 6.5 Revoking Consent & Managing Preferences

Users may revisit their cookie settings at any time to update their preferences. Additionally, those who wish to revoke previously granted consent can do so by:

- Clearing cookies from their browser settings (this will reset consent choices).
- Accessing the website's cookie preferences panel to modify consent options.

# 7. Data Retention & Security

Halo Digital FZ LLC retains cookie data for varying periods depending on the type and purpose of the cookie. We also implement security measures to protect this data from unauthorized access or misuse.

## 7.1 Cookie Retention Periods

- Session Cookies – Temporary cookies that expire automatically when the user closes their browser. These cookies do not persist beyond the current browsing session.
- Persistent Cookies – Stored on a user's device for a predefined period, which can range from a few days to up to 12 months, depending on the function of the cookie. Users can manually delete these cookies at any time via their browser settings.
- Third-Party Cookies – Retention is determined by the respective third-party provider's cookie policy. Users should review the privacy policies of those providers for more details.

We periodically review and update our cookie storage practices to comply with applicable data protection laws, including the UAE PDPL and CCPA.

## 7.2 Security Measures for Cookie Data

To prevent unauthorized access, alteration, or misuse of cookie data, we implement the following security measures:

- Encryption & Secure Storage – Sensitive data stored in cookies is encrypted where applicable.
- Restricted Access – Only authorized systems and personnel have access to cookie-related data.

- Automatic Expiration – Cookies are configured to expire after a predefined period to reduce security risks.
- Regular Security Audits – We conduct periodic reviews of our security protocols related to cookie storage and processing.

### **7.3 User Control Over Stored Cookies**

Users have the right to:

- Delete cookies manually via browser settings at any time.
- Modify cookie preferences through our website's cookie management tool.
- Request information about how we store and use cookie data, in compliance with UAE PDPL and CCPA regulations.

For further details on managing cookies, refer to Section 6 – Managing Cookie Preferences.

## **8. Third-Party Cookies**

Halo Digital FZ LLC uses third-party cookies provided by external services to analyze website traffic, improve marketing efforts, and measure advertising effectiveness. These third-party cookies are set by external platforms and are subject to their respective privacy policies.

### **8.1 What Are Third-Party Cookies?**

Third-party cookies are cookies that are not set directly by our website but by external services that we integrate with. These cookies enable features such as analytics, advertising, and social media interactions. Unlike first-party cookies, which are controlled by us, third-party cookies are managed by external providers, and their retention periods and data usage policies are determined by those providers.

### **8.2 Types of Third-Party Cookies We Use**

We use third-party cookies for the following purposes:

#### **8.2.1 Analytics and Performance Tracking**

These cookies help us measure website traffic, understand user behavior, and improve site performance.

- Google Analytics – Collects anonymized data on page views, session duration, and user interactions.
- Hotjar / Microsoft Clarity (if used) – Provides heatmaps and session recordings to analyze how users navigate our website.

*\* Users can opt out of Google Analytics tracking by using the Google Analytics Opt-Out Tool.*



## 8.2.2 Advertising and Retargeting

These cookies track user behavior across websites to deliver personalized ads and measure the effectiveness of ad campaigns.

- Google Ads (DoubleClick) – Tracks conversions and optimizes ad performance.
- Facebook Pixel – Monitors website visits and user actions for remarketing on Facebook and Instagram.
- LinkedIn Insight Tag – Helps measure engagement with LinkedIn advertising campaigns.
- Twitter/X Ads Tag – Enables audience retargeting and ad performance tracking on Twitter/X.
- TikTok Pixel – Collects data on user interactions for remarketing and ad optimization on TikTok.
- Microsoft Ads (Bing UET Tag) – Tracks conversions from Bing search ads and remarketing audiences.
- Other third-party advertising networks – May include additional platforms used for programmatic advertising, demand-side platforms (DSPs), or affiliate tracking.

*\* Users can manage their ad preferences through Google, Facebook, LinkedIn, and other advertising network settings.*

## 8.2.3 Social Media and Embedded Content

These cookies allow users to share content via social media platforms or interact with embedded third-party content.

- YouTube/Vimeo cookies – Store user preferences for embedded videos and track video interaction.
- Twitter/X cookies – Enable social media sharing features and track engagement with Twitter/X content.
- Facebook cookies – Facilitate social sharing and engagement with Facebook posts, comments, and widgets.
- Instagram cookies – Track user interactions with embedded Instagram content and social buttons.
- LinkedIn cookies – Allow users to share content and engage with LinkedIn posts and job listings.
- Reddit cookies – Enable sharing and engagement with Reddit posts and discussions.
- Pinterest cookies – Support sharing images and tracking engagement with Pinterest pins.
- TikTok cookies – Facilitate embedded video interactions and content sharing on TikTok.
- Other third-party social media services – May include additional networks used for social sharing, commenting, or embedding content.

*\* Users can manage their social media privacy settings to control how these platforms collect and process data.*

### 8.3 User Control Over Third-Party Cookies

Since third-party cookies are managed by external companies, we do not control how they process data. Users can manage or disable third-party cookies through:

- Browser settings – Most browsers allow users to block third-party cookies.
- Ad preference tools – Google, Facebook, and LinkedIn provide opt-out options for targeted advertising.
- Privacy-focused extensions – Tools like Privacy Badger or uBlock Origin can block third-party tracking.

### 8.4 Disclaimer

Halo Digital FZ LLC is not responsible for how third parties collect, use, or store data through their cookies. These third-party services have their own privacy policies governing the collection and use of user data. We encourage users to review these policies for more information:

Analytics & Performance Services:

- Google Analytics Privacy Policy: <https://policies.google.com/privacy>
- Hotjar Privacy Policy: <https://www.hotjar.com/legal/policies/privacy/>
- Microsoft Clarity Privacy Policy: <https://clarity.microsoft.com/terms>

Advertising & Retargeting Services:

- Google Ads Privacy Policy: <https://policies.google.com/technologies/ads>
- Facebook Privacy Policy: <https://www.facebook.com/policy.php>
- LinkedIn Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>
- Twitter/X Privacy Policy: <https://twitter.com/en/privacy>
- TikTok Privacy Policy: <https://www.tiktok.com/legal/page/eea/privacy-policy/en>
- Microsoft Ads (Bing) Privacy Policy: <https://privacy.microsoft.com/en-us/privacystatement>

Social Media & Embedded Content Services:

- YouTube Privacy Policy: <https://policies.google.com/privacy>
- Instagram Privacy Policy: <https://privacycenter.instagram.com/policy>
- Pinterest Privacy Policy: <https://policy.pinterest.com/en/privacy-policy>
- Reddit Privacy Policy: <https://www.redditinc.com/policies/privacy-policy>

Users should refer to these links for detailed information on how these platforms process data and manage cookies.

## 9. Your Rights

Users have specific rights regarding the collection, storage, and use of their personal data under applicable data protection laws, including the United Arab Emirates Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (UAE PDPL) and the California Consumer Privacy Act (CCPA).

These rights allow users to control how their data is processed, including data collected through cookies and similar tracking technologies.

## **9.1 Rights Under UAE PDPL**

Under UAE PDPL, users have the following rights regarding their personal data:

- Right to Access – Users can request confirmation of whether their personal data is being processed and obtain a copy of the data stored about them.
- Right to Rectification – Users may request corrections to inaccurate or incomplete personal data.
- Right to Erasure ("Right to Be Forgotten") – Users can request the deletion of their personal data if it is no longer necessary for the purpose for which it was collected.
- Right to Restrict Processing – Users can request that data processing be restricted in certain circumstances, such as when they contest the accuracy of the data.
- Right to Object to Processing – Users may object to the processing of their personal data for marketing or other purposes.
- Right to Data Portability – Users can request a copy of their personal data in a structured, commonly used format and transfer it to another service provider.

## **9.2 Rights Under CCPA (for California Residents)**

Under CCPA, users in California have the following rights:

- Right to Know – Users can request information about what personal data is being collected, how it is used, and whether it is shared or sold to third parties.
- Right to Opt-Out of Data Sales – Users can opt out of the "sale" or "sharing" of their personal data, including cookie-based advertising tracking.
- Right to Request Deletion – Users may request that their personal data be deleted, subject to certain legal and business exceptions.
- Right to Non-Discrimination – Users will not be denied services, charged different prices, or provided a different level of service for exercising their privacy rights.

## **9.3 Exercising Your Rights**

To exercise any of these rights, users may contact us via:

Email: [support@halodigitalai.com](mailto:support@halodigitalai.com)

Requests will be processed in accordance with applicable laws and regulations. For security purposes, we may require identity verification before fulfilling a request.

Users who wish to opt out of targeted advertising cookies can also manage their cookie preferences through:

- Our Cookie Management Tool (available on the website).
- Browser settings (to block third-party cookies).
- Opt-out mechanisms provided by advertising platforms (e.g., Google, Facebook, LinkedIn).

## **10. Changes to this Policy**

We may update this Cookie Policy from time to time to reflect:

- Changes in applicable laws and regulations, including UAE PDPL, CCPA, and other relevant privacy laws.
- Updates in our business practices, services, or technologies.
- Changes in third-party services that impact our use of cookies.

Any modifications to this policy will be posted on this page with an updated "Effective Date" at the top of the document. In some cases, we may provide additional notice, such as email notifications or banners on our website, if required by law.

Continued use of our website after any changes take effect constitutes acceptance of the revised policy. We encourage users to review this policy periodically to stay informed about how we use cookies.

## **11. Contact Information**

For questions regarding this policy, please contact:

Halo Digital FZ LLC

Email: [support@halodigitalai.com](mailto:support@halodigitalai.com)

Website: [www.halodigitalai.com](http://www.halodigitalai.com)