

FINZY

COOKIE POLICY

Finzy Sociedad de Responsabilidad Limitada

Legal entity No. 3-102-921514, Republic of Costa Rica

Service: Finzy web application (desktop/mobile), Telegram Mini App and related web pages

Version 1.0 | Effective date: 30 March 2026

1. General Provisions

1.1. This Cookie Policy (the "Cookie Policy") describes which cookies and similar technologies are used by the Finzy service (the "Service"), operated by Finzy Sociedad de Responsabilidad Limitada (the "Company"), for what purposes they are applied, how the User may manage their use, and how this relates to the processing of personal data.

1.2. This Cookie Policy applies together with the Finzy Privacy Policy and the Terms of Service (ToS). In the event of any conflict between this Cookie Policy and other user-facing documents with respect to cookies and similar technologies, the provisions of this Cookie Policy prevail.

1.3. For the purposes of this Policy, "cookies" means both HTTP cookies proper and other similar technologies for storing and reading data on the user's device, including localStorage, sessionStorage, SDK identifiers, pixels, tags and similar tools, where used for storing preferences, analysing use of the Service, security, marketing, or similar purposes.

1.4. For the Telegram Mini App and other embedded webview interfaces where the use of classic browser cookies may be limited by the platform's technical features, the Company may apply functionally equivalent mechanisms for storing user preferences and consent status, including localStorage/sessionStorage or server-side storage of settings linked to the user identifier. For the purposes of this Policy, such mechanisms are likewise treated as "cookies and similar technologies."

2. What Cookies Are and Why They Are Used

2.1. A cookie is a small piece of data stored on a user's device when visiting a website or using a web application. Cookies allow the device and browser to be recognised, maintain a login session, save selected settings, ensure security, analyse use of the Service, and, subject to separate consent, enable marketing and advertising tools.

2.2. Some cookies are strictly necessary for the Service to function and do not require separate User consent, since without them the Service cannot operate correctly and securely. Other categories of cookies (e.g. analytical,

functional, marketing and third-party integrations) are used only to the extent and on the terms described in this Policy and in accordance with the User's choice made through the cookie management interface.

3. Categories of Cookies Used by Finzy

3.1. Strictly necessary (essential) cookies. These cookies are required for the basic operation of the Service, including maintaining an authenticated session, load balancing, session security, protection against CSRF and other abuse, and remembering the User's cookie preferences. Without these cookies, the Service or certain of its functions may be unavailable.

3.2. Functional cookies. These cookies are used to remember User preferences such as interface language, display theme, displayed currency, interface settings, completion status of onboarding screens, or other non-essential but convenient settings. Disabling functional cookies does not block access to the Service but may degrade the user experience.

3.3. Analytical cookies. These cookies allow the Company to understand how users interact with the Service: which sections are used most often, which screens cause difficulties, where errors occur, and overall interface performance. Where possible, such data is used in aggregated or anonymised form. Analytical cookies are applied only with the User's consent, except where a specific tool is used exclusively in a strictly necessary mode for technical security and resilience diagnostics.

3.4. Marketing and advertising cookies. These cookies are used to measure the effectiveness of advertising campaigns, track user acquisition sources, prevent repeated display of the same advertisement, and display relevant advertising on third-party resources. Such cookies may be set both by the Company and by third-party advertising platforms and are used only with separate User consent.

3.5. Cookies of third-party embedded services and partner integrations. Where the Service interface uses external services (e.g. support chat, embedded media players, storefront partner widgets, analytics SDKs, anti-fraud/anti-bot solutions, or other integrations), such services may set their own cookies or use similar technologies. Such technologies are classified into the relevant category depending on their purpose (functional, analytical, marketing, strictly necessary) and are disclosed in the table set out in Section 5 of this Policy.

4. Legal Bases for the Use of Cookies

4.1. Strictly necessary cookies are used on the basis of the Company's legitimate interest in ensuring the secure, stable and technically correct operation of the Service, and in performance of the contract with the User, since without them it is impossible to provide the basic functionality of the application.

4.2. All other categories of cookies that are not strictly necessary are used only after obtaining the User's explicit, informed and freely given consent through the cookie banner/consent management centre interface. The absence of consent to such cookies does not affect the ability to use the Service's basic functions, except where a specific additional feature by its nature requires the corresponding storage technology.

5. Specific Cookies That May Be Used

5.1. The table below sets out the disclosure format for specific cookies and similar technologies. Before publication of this Policy, the Company is required to complete the up-to-date list of actually used cookies, including their technical names, category, provider, retention period and purpose.

Cookie / Technology Name	Category	Provider	Retention Period	Purpose
session_id	Strictly necessary	Finzy	Until end of session	Maintaining the User's authenticated session
cookie_consent	Strictly necessary	Finzy	12 months	Storing the User's cookie preference choice
ui_lang	Functional	Finzy	12 months	Saving the selected interface language
analytics_id	Analytical	Analytics provider / Finzy	13 months	Interface usage statistics
ad_ref	Marketing	Advertising platform / Finzy	90 days	Measuring advertising campaign effectiveness

5.2. The Company keeps the list of cookies and similar technologies set out in the table above up to date and reviews it on a regular basis, including whenever new tools or service providers are integrated into the Service.

6. First-Party and Third-Party Cookies

6.1. The Company may use both its own cookies (first-party cookies) set directly by Finzy domains, and cookies of third parties (third-party cookies) set by external service providers embedded in the Service or used for analytics, marketing, security and technical support purposes.

6.2. The use of third-party cookies is permitted only to the extent necessary for the relevant purpose, and provided the User has been duly informed of such category of cookies. Where the relevant category requires consent, third-party cookies are not activated until such consent is obtained.

7. Cookie Retention Periods

7.1. Depending on their duration, cookies may be: (a) session cookies — automatically deleted after the browser is closed or the session ends; or (b) persistent cookies — stored on the User's device for a specified period or until manually deleted by the User.

7.2. The specific retention period for each cookie or similar technology is indicated in the table in Section 5. The Company undertakes not to store cookies for longer than necessary to achieve the relevant purpose.

8. Consent Management and Opt-Out

8.1. On first visiting the Service, the User is shown a cookie banner through which they may: accept all optional categories of cookies; reject all optional categories of cookies; or configure cookie use by category.

8.2. The User may change a previously made choice at any time by opening the cookie management centre via a dedicated interface element ("Cookie Settings") available in the Service. Withdrawing consent must be no more difficult than giving it.

8.3. Additionally, the User may manage cookies through their browser or device settings, including deleting previously stored cookies, blocking their installation, or restricting tracking. However, disabling strictly necessary cookies may result in the Service functioning incorrectly or certain functions becoming unavailable.

9. Relationship Between Cookies and Personal Data

9.1. Some cookies and similar technologies may be linked to personal data of the User, in particular where they contain or make it possible to link a unique device/user identifier, authentication data, user behaviour data, approximate geolocation, referral source, or other technical attributes that, taken together, allow the User to be identified directly or indirectly.

9.2. To the extent that data obtained through cookies constitutes personal data, its processing is carried out in accordance with the Finzy Privacy Policy.

10. Changes to This Policy

10.1. The Company may amend this Cookie Policy in connection with changes to the technologies used, service providers, legislation, or the structure of the Service.

10.2. The current version of the Policy is published in the Service interface and takes effect from the date indicated in its heading. Where changes are material and affect cookie categories or the consent process, the User may be additionally notified via banner, email, or in-app notifications.

11. Contact Information

11.1. For questions relating to the use of cookies and similar technologies and the processing of related personal data, the User may contact Finzy at: info@finzypay.io.

11.2. This Cookie Policy is prepared as a stand-alone user document for publication in the Service interface and must be used together with the banner/consent management mechanism implemented in the application.