

COOKIE POLICY

Document: TC-COM-COOKIES **Version:** 1.1 **Effective date:** September 28, 2026 **Controller:** TinyCIO Inc. (Wyoming, USA), EIN 37-2015210, 1309 Coffeen Avenue STE 1200, Sheridan, WY 82801, USA, we@tinycio.com **Site:** <https://tinycio.com> and its subdomains

This Policy explains which cookies and similar technologies the tinycio.com website uses, why they are needed and how you can manage your choice. The same rules apply on all TinyCIO websites — tinycio.com, tinycio.ru, tinycio.es, tinycio.ma and their subdomains: each domain publishes a version in the language of the site, issued by the TinyCIO company of the respective country.

1. What cookies are

Cookies are small text files that a website stores in your browser. Browser local storage (localStorage) and pixels work in a similar way. In this Policy, all of these technologies are referred to as cookies.

2. Categories and your choice

Category	Purpose	Is consent required?
Necessary	Site language, remembering your cookie choice, the website chat	No — the site does not work without them; they can only be disabled in your browser settings
Analytics	Understanding how many people visit the site, where they come from and how they use it, so that we can improve our pages	Yes — enabled only after you consent
Marketing	Measuring advertising effectiveness: advertising platform pixels and passing the advertising identifier on at sign-up, so that we can see which advertisement brought a company to us	Yes — enabled only after you consent

2.1. On your first visit, the site shows a window with the buttons "Accept all", "Reject" and "Customize". Until you respond, no analytics or marketing cookies are set and their scripts are not

loaded. "Reject" is as easy to use as "Accept all" and is shown with the same prominence; in "Customize", the Analytics and Marketing switches are off by default.

2.2. You can change or withdraw your consent at any time via the "Cookie settings" link at the bottom of every page. If you withdraw your consent to analytics, the site deletes the cookies set by the analytics services on the tinycio.com domain and reloads the page.

2.3. Your choice is stored in the `tinycio_consent` cookie and applies to tinycio.com and all its subdomains, so that you are not asked again on each site. After 6 months, and whenever a new cookie category is introduced, the site will ask you again. A choice made on tinycio.com does not apply to other TinyCIO domains (tinycio.ru, tinycio.es, tinycio.ma).

3. List of cookies

Name	Set by	Purpose	Category	Duration
<code>tinycio_consent</code>	TinyCIO (first party)	Your choice of cookie categories	Necessary	6 months
<code>NEXT_LOCALE</code>	TinyCIO (first party)	Site language	Necessary	12 months
<code>tcio_chat_uid</code> (localStorage)	TinyCIO (first party)	Continuing your conversation in the website chat; created only when you start a chat	Necessary	until deleted in the browser
<code>_ga</code> , <code>_ga_*</code>	Google Analytics (third party)	Distinguishing visitors and sessions for statistics	Analytics	13 months
<code>_ym_uid</code> , <code>_ym_d</code>	Yandex Metrica, YANDEX LLC (third party)	Distinguishing visitors for statistics	Analytics	12 months
<code>_ym_isad</code> , <code>_ym_visorc</code> and other technical Metrica cookies	Yandex Metrica (third party)	Detecting ad blockers; session recording (Webvisor) to analyse the usability of pages	Analytics	from 30 minutes to 2 days

3.1. The Webvisor session recording of Yandex Metrica records pointer movements and page scrolling. Text you type into forms and into the chat is not recorded, and the chat conversation area is excluded from recording entirely.

3.2. As of the date of this version, no marketing cookies are set on the site. If we add an advertising platform pixel, it will work only if you consent to the Marketing category, and the list in this section will be updated before it is added.

4. Data transmitted through cookies; international transfers

4.1. Analytics services receive information about your visit: the page address, the referral source, the type of device and browser, approximate location based on the IP address and actions on the page, linked to the cookie identifiers listed above. We do not pass names, phone numbers, email addresses or the text of your messages to them. Under the GDPR and the UK GDPR, this information is pseudonymised personal data.

4.2. **Google Analytics** is provided by Google LLC (USA); for the European Economic Area (EEA), the Google entity is Google Ireland Limited (Ireland). Data collected by Google Analytics may be processed in the United States. For visitors from the EEA, such transfers rely on the adequacy decision of the European Commission for the EU-U.S. Data Privacy Framework, under which Google LLC is certified, and for visitors from the United Kingdom — on the UK Extension to that framework.

4.3. **Yandex Metrica** is provided by YANDEX LLC (Moscow, Russian Federation); data collected by it are transferred to and processed in the Russian Federation. Russia has not been recognised by the European Commission or by the United Kingdom as ensuring an adequate level of personal data protection. **This involves risks for you:** your data may be accessed by Russian public authorities under rules that do not provide protection equivalent to EU or UK law, and you may find it more difficult to exercise your rights and obtain effective remedies. In the absence of an adequacy decision and of appropriate safeguards, for visitors from the EEA and the United Kingdom we transfer data to Yandex Metrica **only on the basis of your explicit consent under Art. 49(1)(a) GDPR / UK GDPR**, which you give by enabling the Analytics category after having been informed of these risks in this Policy. If you do not want your data to be transferred to Russia, do not enable the Analytics category.

4.4. The processing of data by third-party services is also governed by their own privacy policies.

5. Legal bases

5.1. **Visitors from the EEA and the United Kingdom.** Necessary cookies are stored and read without consent, as they are strictly necessary to provide the site and the service you request (EU

ePrivacy rules as implemented in the Member States; UK PECR); the related processing is based on our legitimate interest in operating the site and remembering your choices (Art. 6(1)(f) GDPR / UK GDPR). Analytics and marketing cookies, and the related processing of personal data, are based on your consent (Art. 6(1)(a) GDPR / UK GDPR), which you give in the choice window and can withdraw at any time. Withdrawal does not affect the lawfulness of processing before withdrawal.

5.2. Other visitors. The same consent mechanism applies to all visitors, wherever they are located: analytics and marketing cookies are used only with your consent, and you can withdraw it at any time as described in Section 2.

5.3. Other matters of personal data processing are governed by the Privacy Policy (TC-COM-PRIVACY).

6. Your rights

6.1. If you are in the EEA or the United Kingdom, you have the rights of access, rectification, erasure, restriction of processing, objection and data portability, and the right to withdraw your consent at any time. To exercise them, contact we@tinycio.com.

6.2. You also have the right to lodge a complaint with a supervisory authority — in the EEA, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement; in the United Kingdom, with the Information Commissioner's Office (ICO).

6.3. Visitors from other countries may send questions and requests to the same address; we will handle them in accordance with applicable law. The rights of California residents are described in the Privacy Policy (TC-COM-PRIVACY).

7. Other ways to manage cookies

7.1. You can delete or block cookies in your browser settings. If you block necessary cookies, some site features (language selection, chat) may not work properly, and the cookie choice window will keep appearing.

8. Changes

8.1. We update this Policy when the set of cookies changes. The current version and the history of versions are published on the Site in the legal documents section. If a new version introduces a new cookie category, the site will ask for your consent again.

8.2. Questions about cookies and data processing — we@tinycio.com.

