

COOKIE POLICY

ICTS Logistic s.r.o.

1. What Are Cookies?

Cookies are small text files that are stored on your device (computer, tablet, mobile phone) when you visit a website. They allow the website to remember your actions and preferences (such as language, font size and other settings) for a certain period of time, so you do not have to re-enter them every time you visit the site or navigate from one page to another.

Cookies can be first-party (set directly by our website) or third-party (set by external service providers, e.g. by Google for analytics purposes). Third-party cookies (e.g. from Google Analytics) allow service providers to collect data about user behaviour across multiple websites and are primarily used for traffic analysis and site performance.

Cookies and similar technologies (local storage, pixels, web beacons) may constitute personal data within the meaning of Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter "GDPR") if they enable direct or indirect identification of the user. Even pseudonymised data (such as IP addresses or unique user identifiers) are considered personal data and are subject to protection under the GDPR.

We distinguish between session cookies, which are automatically deleted when the browser is closed, and persistent cookies, which remain on your device for a specified period of validity or until you manually delete them.

2. Legal Basis for Processing

The processing of personal data through cookies is carried out on the following legal bases:

Essential cookies – legitimate interest of the controller in ensuring the functionality of the website (Art. 6(1)(f) GDPR);

Functional cookies – currently not in use. If implemented, the legal basis will be determined according to the scope of data processed;

Analytics cookies – user consent (Art. 6(1)(a) GDPR) in accordance with the ePrivacy Directive (Article 5(3)).

Consent for optional cookies is required separately (granular consent) and is not conditional on consent to other processing operations. In accordance with the CJEU ruling in the Planet49 case (C-673/17), all optional cookies are disabled by default (opt-in) and require active user consent.

Optional cookies are only stored after the user has given consent through the cookie banner. You can withdraw your consent at any time just as easily as you gave it.

3. What Cookies Do We Use?

3.1 Essential cookies

These cookies are essential for the basic functionality of the website and cannot be disabled in our systems. They are usually set only in response to your actions that constitute a request for services, such as setting your privacy preferences or filling in forms.

Name	Purpose	Validity	Provider	Legal basis
cookieConsent	Storing your consent to the use of cookies	12 months	icts-logistic.eu	Legitimate interest (Art. 6(1)(f) GDPR)

3.2 Functional cookies

We currently do not use functional cookies. If implemented, this section will be updated.

3.3 Analytics cookies

In order to improve our services, we may implement analytics cookies in the future to measure website traffic and performance. In such cases, all information will be pseudonymised and processed in aggregated form. IP addresses will be anonymised using the IP anonymisation feature, thereby minimising the scope of personal data processed.

If analytics cookies are activated, the following cookies may be used:

Name	Purpose	Validity
_ga	Distinguishing users	2 years
ga[container-id]	Maintaining session state	2 years
_gid	Distinguishing users	24 hours
_gat	Request rate limiting	1 minute

Provider: Google Analytics | Legal basis: Consent (Art. 6(1)(a) GDPR)

Google Analytics may also use other technical cookies required for the functioning of analytics services (e.g. _gcl_*, _gac_*).

More information about Google Analytics cookies can be found at: <https://support.google.com/analytics/answer/11397207>

4. Google Consent Mode V2

If Google Analytics is implemented, Google Consent Mode V2 will be deployed on our website to ensure the proper functioning of analytics tools depending on the user's cookie consent.

Google Consent Mode V2 will work with the following parameters:

analytics_storage – controls whether cookies can be stored for analytics purposes. Without user consent, detailed behavioural data on the website will not be collected.

ad_storage – controls the storage of cookies for advertising purposes. Our company currently does not use advertising cookies; this parameter is set to "denied".

ad_user_data / ad_personalization – parameters for advertising purposes. Our company currently does not use them; both are set to "denied".

functionality_storage – controls the storage of functional cookies.

security_storage – controls the storage of security cookies. Both parameters are set to "granted" as they are essential for the proper functioning of the website.

5. Transfer of Personal Data to Third Parties

If Google Analytics is activated, your personal data (pseudonymised identifier, anonymised IP address, website behavioural data) may be transferred to:

- Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland;
- Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

The transfer of personal data to the USA (a third country outside the EEA) will be carried out on the basis of:

1. **EU-US Data Privacy Framework (DPF)** – European Commission adequacy decision (Art. 45 GDPR). Google LLC is certified under the DPF.

2. **Standard Contractual Clauses (SCC)** approved by the European Commission (Art. 46 GDPR) as a supplementary protection mechanism.

Data will be retained for a maximum of 14 months from the last user activity in accordance with the default data retention settings in Google Analytics 4.

If Google Analytics is deployed, we will conduct a Transfer Impact Assessment (TIA) in accordance with EDPB recommendations and Schrems II.

In addition to Google (Google Analytics), your data may also be shared with other service providers – hosting provider, cloud service provider and website technical support – who act as processors and process data exclusively on the basis of our instructions and concluded data processing agreements

pursuant to Art. 28 GDPR.

6. How to Manage Cookies

6.1 Settings on our website

You can change your cookie settings at any time by clicking the "Cookie settings" button at the bottom of the page. Here you can:

- reject all optional cookies;
- accept all cookies;
- select which cookie categories you want to allow.

Withdrawing consent is just as easy as giving it – one click in the cookie settings is all it takes. The cookie banner periodically appears for re-confirmation of your consent (by default every 12 months).

Our banner is designed in accordance with EDPB Guidelines 05/2020 on consent – it does not contain dark patterns that could mislead or force the user to give consent. We respect Global Privacy Control (GPC) signals and similar "Do Not Sell/Share" signals – if your browser or device sends such a signal, we will not store optional cookies.

6.2 Browser settings

Most web browsers allow you to control cookies through their settings. Instructions for specific browsers:

Google Chrome: 1. Click the Menu icon (three dots) → 2. "Settings" → 3. "Privacy and security" → 4. "Cookies and other site data" → 5. Adjust cookie settings.

Mozilla Firefox: 1. Click the Menu icon (three lines) → 2. "Settings" → 3. "Privacy & Security" → 4. In the "Cookies and Site Data" section, adjust settings.

Safari (macOS): 1. In the Safari menu, select "Settings" → 2. "Privacy" tab → 3. Adjust cookie and tracking settings.

Microsoft Edge: 1. Click the Menu icon (three dots) → 2. "Settings" → 3. "Cookies and site permissions" → 4. "Manage and delete cookies and site data".

Note: Disabling all cookies may affect the functionality of some parts of the website. More information about cookies can be found at www.allaboutcookies.org.

7. Your Rights

You have the right to withdraw your consent to the use of cookies at any time. Withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent prior to its withdrawal.

In connection with the processing of personal data through cookies, you have the following rights under the GDPR:

- Right of access to personal data (Art. 15 GDPR);
- Right to rectification of personal data (Art. 16 GDPR);
- Right to erasure of personal data (Art. 17 GDPR);
- Right to restriction of processing (Art. 18 GDPR);
- Right to data portability (Art. 20 GDPR);
- Right to object to processing (Art. 21 GDPR).

How to exercise your rights in relation to cookies:

Through the cookie banner – by clicking "Cookie settings" you can change or withdraw your consent at any time;

By e-mail – by sending a request to info@icts-logistic.eu;

In writing – by sending a request to the correspondence address listed below.

More information about the processing of your personal data can be found in our Personal Data Protection Policy: <https://www.icts-logistic.eu/docs/en/gdpr.pdf>

To file a complaint with the Office for Personal Data Protection of the Slovak Republic, you have the right to contact the supervisory authority if you believe that your data protection rights have been violated. Contact details:

Office for Personal Data Protection of the Slovak Republic:

Hraničná 12, 820 07 Bratislava 27

Tel.: +421 2 3231 3214

E-mail: statny.dozor@pdp.gov.sk

Web: www.dataprotection.gov.sk

8. Changes to the Cookie Policy

We reserve the right to modify this Cookie Policy at any time in accordance with changes in legislation, technology or our business practices. We will inform you of significant changes through a banner on the website or by e-mail.

Changes will take effect 7 days after the date of publication of the amended version on the website or after the date of sending the e-mail notification, whichever occurs first.

This Cookie Policy has been prepared with regard to the specific technical infrastructure and scope of online services of ICTS Logistic s.r.o.

9. Contact

If you have any questions regarding this Cookie Policy, the use of cookies or the protection of personal data, please contact us:

ICTS Logistic s.r.o.

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