

GOLDEN TRADER

COOKIE POLICY

This Policy explains how Golden Trader uses cookies and similar technologies on its public website, registration journey, client portal and other digital services, and how users can manage their choices.

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Launch control

The live cookie banner, preference centre and cookie inventory must be configured from a scan of the deployed production website. Non-essential technologies must not be activated before the user's choice where prior consent is required by applicable law.

1. Purpose and scope

1.1 This Policy applies to Golden Trader Ltd (Golden Trader, we, us or our) and its use of cookies, pixels, tags, software development kits, local storage and comparable technologies on golden-trader.com, the registration journey, client portal and other digital services that link to this Policy.

1.2 It should be read with our Privacy Notice, which explains how we process personal data, the purposes and legal grounds that may apply, data sharing, retention and privacy rights.

1.3 This Policy does not itself create a promise that every technology described is active. The cookie preference centre or live cookie list identifies the technologies deployed at the relevant time.

2. About cookies and similar technologies

2.1 A cookie is a small text file placed on or read from a browser or device when a user visits a website. Cookies may recognise a browser, maintain a secure session, remember a preference, measure performance or support campaign attribution.

2.2 Similar technologies may include pixels, tags, scripts, local or session storage, device identifiers and software development kits. References to cookies in this Policy include these technologies unless the context requires otherwise.

2.3 Cookies may contain or be linked to identifiers and usage data. Depending on the circumstances, this information may constitute personal data when it identifies, relates to or can reasonably be associated with an individual or device.

3. Who is responsible

3.1 Golden Trader determines the purposes and configuration of first-party cookies used on its digital services. A third-party provider may separately determine how it processes information collected through its technology; its own privacy or cookie notice may therefore also apply.

3.2 Questions about Golden Trader's use of cookies may be sent to info@golden-trader.com.

4. Cookie categories

4.1 Strictly necessary cookies. These support functions requested by the user or required to operate and secure the service, such as authentication, session continuity, load balancing, fraud prevention, form submission and recording cookie choices. They cannot normally be switched off through the preference centre because the relevant service may not function without them.

4.2 Functional cookies. These remember choices or provide enhanced features, such as language, region, accessibility or display preferences. If disabled, some personalised functions may not operate as intended.

4.3 Analytics and performance cookies. These help us understand traffic, page performance, errors, navigation and completion of important journeys. We may use the results to improve reliability, usability and content.

4.4 Marketing and advertising cookies. If activated, these may measure campaign performance, attribute visits or conversions, limit repetition or support relevant advertising on other services. They may follow a browser or device across websites where a provider's technology is used.

4.5 A cookie is classified by its actual purpose and configuration, not merely by the name assigned to it by a provider. A technology serving more than one purpose must be treated according to the purpose requiring the greatest level of user choice.

5. First-party and third-party technologies

5.1 First-party cookies are set through a Golden Trader domain. Third-party cookies or similar technologies are provided through another organisation's domain or service, for example a hosting, security, communications, analytics, customer-support or advertising provider.

5.2 The presence and identity of third parties may change as our website, CRM, KYC, payments, support and analytics arrangements develop. The deployed cookie inventory must identify the provider and purpose before a new non-essential technology is enabled.

5.3 Links to external websites are governed by the external operator's own practices. Golden Trader does not control cookies placed solely through a third-party website after a user leaves our service.

6. Information collected

6.1 Depending on the technology and user choices, cookie-related information may include IP address, browser and device type, operating system, language, approximate location, referral source, pages and features used, timestamps, session or security identifiers, campaign parameters, error data and interaction events.

6.2 Cookies should not be used to store account passwords, private cryptographic keys, recovery phrases or complete payment-card details.

6.3 Where cookie data is combined with account, registration, KYC or transaction information, it will be handled under the Privacy Notice and applicable access controls.

7. How we use cookie information

7.1 We may use cookie information to deliver requested pages and account functions; authenticate users; protect accounts and systems; detect misuse; remember settings; troubleshoot errors; monitor availability; measure content and campaign performance; improve user journeys; and meet legal, compliance, audit or record-keeping requirements.

7.2 We will not use a strictly necessary classification to conceal advertising or unrelated tracking. Marketing or optional analytics technologies will be subject to the choices and requirements described below.

8. Consent and preferences

8.1 Where applicable law requires prior consent, non-essential cookies will remain disabled until the user makes an informed, affirmative choice. Strictly necessary cookies may operate without consent where the applicable exemption is satisfied.

8.2 The cookie banner or preference centre should allow users to accept, reject or configure non-essential categories. Rejecting non-essential cookies should be presented as clearly and accessibly as accepting them.

8.3 A user may change or withdraw a choice at any time through the Cookie Settings link or equivalent preference control made available on the website. Withdrawal does not affect processing that was lawful before the preference changed.

8.4 A changed preference normally applies to the browser and device on which it was made. Users may need to repeat the choice on another device, browser or profile, or after deleting preference cookies.

8.5 Consent records may include the choice, category, time, policy or banner version and a limited device or consent identifier. They are retained as reasonably required to apply the choice and demonstrate compliance.

9. Browser and device controls

9.1 Most browsers allow users to view, block or delete cookies, restrict third-party cookies and clear website data. Instructions are available in the browser's help or privacy settings.

9.2 Browser deletion may remove the cookie that stores a user's preference. If that occurs, the banner may appear again. Blocking all cookies may prevent login, authentication, security checks, form completion or other requested functions.

9.3 Device-level controls and provider opt-out tools may supplement, but do not replace, the Golden Trader preference centre where it is available.

10. Duration

10.1 A session cookie generally expires when the browser session ends. A persistent cookie remains until its stated expiry, deletion by the user or removal by the provider.

10.2 Duration must be proportionate to purpose. The live cookie inventory should state the expiry or retention period for each deployed technology; persistent identifiers should not be retained longer than reasonably necessary.

11. Third parties and international processing

11.1 Cookie information may be processed by providers supporting hosting, cybersecurity, identity or KYC checks, client communications, technical support, analytics, CRM, payments or marketing. Providers should receive only the access reasonably necessary for their role and be subject to appropriate contractual and security controls.

11.2 A provider may process information in a country different from the user's location. Where data protection law requires safeguards for an international transfer, Golden Trader will use an appropriate transfer mechanism or another lawful basis, as further described in the Privacy Notice.

11.3 Golden Trader does not represent that cookie data will always remain in one country or that all analytics data is anonymous. Configuration, aggregation and pseudonymisation reduce risk but do not automatically remove all privacy obligations.

12. Security

12.1 We use reasonable technical and organisational measures designed to protect cookie-related information against unauthorised access, alteration, disclosure or loss. Measures may include encryption in transit, restricted access, secure cookie attributes, monitoring and vendor controls.

12.2 No website, transmission or storage method is completely secure. Users should protect their devices and account credentials and contact us promptly if they suspect unauthorised account access.

13. Effect of disabling cookies

13.1 The public website may remain partly available if optional cookies are rejected. However, disabling strictly necessary cookies can prevent registration, email verification, login, client-portal access, session continuity, security checks, KYC submission, payment journeys or preference storage.

13.2 Golden Trader will not deny a core service merely because a user rejects optional advertising or analytics cookies, unless the relevant technology is genuinely necessary to provide a specific user-requested feature or another lawful exception applies.

14. Browser privacy signals

14.1 Browser signals such as Do Not Track and Global Privacy Control are not implemented uniformly across websites and jurisdictions. Golden Trader will assess and honour such signals where required by applicable law and technically supported, while continuing to provide direct cookie controls.

15. Children

15.1 Golden Trader's trading services are intended for adults who may lawfully enter into the relevant agreement. We do not knowingly use cookies to profile children for targeted advertising.

16. Changes to this Policy

16.1 We may update this Policy when our services, providers, technologies or legal obligations change. The revised version and effective date will be published on the website. Material changes to optional-cookie purposes may require a renewed choice.

16.2 The policy owner must review this document and the live cookie inventory at least annually and before enabling a new tag, analytics tool, embedded service or advertising technology.

17. Contact and privacy rights

17.1 Questions, requests or complaints about cookies or related personal data may be sent to info@golden-trader.com. Please include enough information for us to identify the relevant service, date, device or account without sending passwords or private security credentials.

17.2 Rights concerning personal data, the way to exercise them and any right to complain to a competent authority are described in the Golden Trader Privacy Notice and depend on the law applicable to the individual and processing.

Schedule 1 - Cookie category framework

Category	Typical purpose	Default treatment
Strictly necessary	Security, login, sessions, routing, forms, fraud controls and preference records	Always active only where genuinely necessary or otherwise exempt
Functional	Language, region, accessibility and enhanced user preferences	Optional where consent or choice is required
Analytics / performance	Traffic, errors, speed, navigation and journey completion	Do not activate before required consent
Marketing / advertising	Attribution, conversion measurement, frequency control and retargeting	Do not activate before required consent

Schedule 2 - Live cookie inventory and implementation controls

This Schedule is an operational control for the website owner and developers. It is not a substitute for scanning and validating the production deployment. Before launch and after any material release, Golden Trader must generate or update a live inventory containing the following fields for every cookie or similar technology.

Required field	What must be recorded
Name and provider	Exact cookie, key, tag or identifier name and the organisation providing it
Domain and path	Where it is set or accessed, including whether it is first-party or third-party
Purpose	Plain-language description of what it actually does and why it is used
Category	Strictly necessary, functional, analytics/performance or marketing/advertising
Duration	Session or exact persistent expiry/retention period
Data and recipients	Main data elements collected and the provider or recipient with access
Consent status	Whether prior consent is required and the preference-centre control that governs it

Implementation checklist

- Run a production-domain cookie and tag scan before launch; repeat it after material releases and at reasonable intervals.
- Block non-essential tags until the relevant choice is recorded where prior consent is required.
- Provide clear Accept, Reject and Manage choices and keep the preference centre accessible from every page.
- Ensure the banner categories, policy wording, tag manager rules and live inventory use the same classification.
- Record the policy/banner version linked to each choice and test withdrawal on a fresh and returning browser.
- Review embedded video, chat, maps, social media, analytics, CRM, KYC and payment components for third-party storage or access.
- Do not publish invented cookie names or fixed durations; use the values verified in production.

Operational note

If the live inventory conflicts with this Policy, the inconsistency must be investigated and corrected. A new vendor or tag must not be treated as approved merely because a broad category appears in this document.