

1. Introduction

This Cookie Policy explains how Pladinum Group SL ("Pladinum", "we", "us", "our") uses cookies, web beacons, pixels, scripts, and similar tracking technologies (collectively "**Trackers**") when you visit our website(s), customer portal, and related online services (collectively the "**Site**").

This policy should be read together with our Privacy Policy and our General Terms and Conditions, which provide further detail on how we process personal data.

We are committed to transparency regarding the technologies we use and the data we collect. This policy describes what Trackers are, which ones we use, why we use them, and how you can control your preferences.

2. What Are Cookies and Trackers?

Cookies are small text files that are placed on your device (computer, tablet, or mobile phone) when you visit a website. They are widely used to make websites function efficiently, to improve the user experience, and to provide information to website operators.

Trackers is a broader term we use in this policy to refer to cookies and other similar technologies, including web beacons (also known as tracking pixels), embedded scripts, local storage objects, and fingerprinting technologies. Unless a distinction is necessary, we refer to all such technologies collectively as "Trackers."

Trackers can be classified in several ways:

By origin: First-party Trackers are set by Pladinum directly. Third-party Trackers are set by external services integrated into our Site (e.g., analytics providers, font services).

By duration: Session Trackers are temporary and expire when you close your browser. Persistent Trackers remain on your device for a set period or until you manually delete them.

By purpose: Trackers serve different functions, which are described in detail in Section 4 below.

3. Legal Basis for Using Trackers

We use Trackers in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR"), the ePrivacy Directive (Directive 2002/58/EC) as implemented in applicable national laws, and the Spanish Ley Orgánica de Protección de Datos y garantía de los derechos digitales (LOPDGDD).

The legal basis for each category of Tracker is as follows:

Strictly Necessary Trackers: These do not require your consent, as they are essential for the operation of the Site and the delivery of Services you have requested. Their legal basis is legitimate interest and contractual necessity (Article 6(1)(b) and (f) GDPR).

All Other Trackers: Functional, analytics, performance, and marketing Trackers require your prior consent (Article 6(1)(a) GDPR; Article 5(3) ePrivacy Directive). You can provide, refuse, or withdraw consent at any time through our cookie consent management platform, provided by CookieFirst.

4. Categories of Trackers We Use

4.1 Strictly Necessary Trackers

These Trackers are essential for the basic operation of the Site. They enable core functions such as page navigation, access to secure areas, session management, load balancing, and the display of the cookie consent banner itself. The Site cannot function properly without them. No consent is required for these Trackers.

Tracker Name	Provider	Purpose	Duration	Type
cookiefirst-consent	CookieFirst	Stores your cookie consent preferences	1 year	First-party
quform_session_*	Pladinum (Quform)	Maintains form session and protects against form tampering	Session	First-party
wssplashchk	Pladinum (Imunify360 WebShield)	Anti-bot security verification	30 minutes	First-party
wordpress_logged_in_* / wordpress_sec_*	Pladinum (WordPress)	Authenticates logged-in users (registered customers and staff)	Session	First-party
qc_bouncer / qc_clearance	QUIC.cloud	Bot management; set only when a security challenge is triggered	30 minutes	Third-party

4.2 Functional Trackers

These Trackers enable enhanced functionality and personalisation, such as remembering your language preference, region, or display settings. They may be set by us or by third-party providers whose services we have integrated into our pages. If you do not allow these Trackers, some or all of these features may not function properly.

Tracker Name	Provider	Purpose	Duration	Type
wp-wpml_current_language	Pladinum (WPML)	Stores preferred language selection	Session	First-party
elementor	Pladinum (Elementor)	Stores visitor interface preferences	Persistent	First-party
chatwoot-client/*	Pladinum (Chatwoot, self-hosted)	Live chat widget state and preferences	6 months	First-party

4.3 Analytics and Performance Trackers

These Trackers help us understand how visitors interact with the Site by collecting information about pages visited, time spent, errors encountered, and general usage patterns. This data is aggregated and anonymised where possible. We use this information to improve the performance and usability of our Site and Services.

Tracker Name	Provider	Purpose	Duration	Type
_pk_id	Pladinum (Matomo)	Distinguishes unique	13 months	First-party

Tracker Name	Provider	Purpose	Duration	Type
		visitors for analytics		
_pk_ses	Pladinum (Matomo)	Maintains the analytics session	30 minutes	First-party
_ga / ga*	Google Analytics 4 (Google Ireland Ltd)	Distinguishes users and tracks sessions; set only after consent	Up to 2 years	Third-party

Google Analytics data is processed by Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland). We have implemented IP anonymisation and have concluded a Data Processing Agreement with Google. Data may be transferred to the United States under Standard Contractual Clauses (SCCs). For more information, see Google's Privacy Policy.

4.4 Tag Management

Tag management services help us deploy and manage scripts and Trackers on the Site efficiently from a centralised platform. These services may process data that passes through them in connection with the loading and execution of other Trackers.

Tracker Name	Provider	Purpose	Duration	Type
Google Tag Manager	Google Ireland Limited	Centralised management of website tags and scripts	N/A (no cookies set directly)	Third-party

Google Tag Manager does not set cookies itself but manages the deployment of other services that may set cookies. Processing is handled by Google Ireland Limited.

4.5 External Content and Font Services

All fonts used on the Site, including icon fonts, are hosted directly on Pladinum's own infrastructure. No font files are loaded from external providers, and no data is transmitted to third-party font services when you visit the Site.

4.6 Marketing and Advertising Trackers

At present, Pladinum does not use marketing, retargeting, or behavioural advertising Trackers on its Site. Should this change in the future, this policy will be updated accordingly and consent will be obtained through the CookieFirst consent management platform before any such Trackers are activated.

4.7 Social Media Interaction

The Site may contain links to or integrations with external social media platforms (such as LinkedIn, X/Twitter, Facebook, Instagram, TikTok, and YouTube). When you interact with these features, the respective social media platform may set its own Trackers and collect data in accordance with its own privacy policy.

We recommend reviewing the privacy settings and policies of each social media platform you use. Logging out of these platforms before visiting our Site can help prevent the association of browsing data with your social media profile.

5. Consent Management — CookieFirst

We use CookieFirst (operated by Digital Data Solutions BV, Netherlands) as our consent management platform ("CMP"). CookieFirst is certified under the IAB Transparency & Consent Framework and enables us to obtain, record, and manage your cookie consent preferences in compliance with GDPR and ePrivacy requirements.

When you first visit our Site, a consent banner is displayed, allowing you to:

- (i) Accept all Trackers;
- (ii) Reject all non-essential Trackers;
- (iii) Customise your preferences by category (functional, analytics, marketing).

Your consent preferences are stored in a first-party cookie (cookiefirst-consent) and are respected across all pages of the Site. Non-essential Trackers are not loaded until and unless you provide affirmative consent.

Withdrawing Consent: You can change or withdraw your consent at any time by clicking the cookie settings icon (typically displayed in the bottom-left corner of the Site) or by visiting the cookie preferences centre accessible through the Site footer. Withdrawal of consent does not affect the lawfulness of processing based on consent given prior to withdrawal.

6. Managing Trackers via Your Browser

In addition to using our CMP, you can manage Trackers directly through your browser settings. Most browsers allow you to view, block, or delete cookies. Please note that disabling or deleting certain cookies may affect the functionality of the Site.

Instructions for common browsers:

Google Chrome: Settings → Privacy and Security → Cookies and other site data

Mozilla Firefox: Settings → Privacy & Security → Cookies and Site Data

Safari: Preferences → Privacy → Manage Website Data

Microsoft Edge: Settings → Cookies and site permissions → Manage and delete cookies

Brave: Settings → Privacy and security → Cookies and other site data

You may also use browser extensions or privacy tools such as uBlock Origin, Privacy Badger, or Ghostery to manage third-party Trackers.

For mobile devices, cookie settings are typically accessible through your device's browser settings or the settings menu of the relevant application.

7. Do Not Track (DNT) Signals

Some browsers transmit a "Do Not Track" (DNT) signal to websites. There is currently no universally accepted standard for how websites should respond to DNT signals. Pladinum respects your privacy choices and encourages you to use our CMP (CookieFirst) to manage your preferences, as this provides the most reliable and granular control over Tracker behaviour on our Site.

8. International Data Transfers

Some third-party Tracker providers process data outside the European Economic Area (EEA). Where personal data is transferred to countries that do not benefit from an adequacy decision by the European Commission, we ensure appropriate safeguards are in place, including Standard Contractual Clauses (SCCs) approved by the European Commission, or other legally recognised transfer mechanisms.

Details of specific transfer mechanisms for each third-party provider are set out in the tables in Section 4 above, and in the provider's own privacy policy.

9. Data Retention

The retention period for data collected via Trackers depends on the type of Tracker and the purpose for which it is used. Session cookies are deleted when you close your browser. Persistent cookies remain on your device for the duration specified in the tables in Section 4, or until you delete them manually.

Data collected through analytics Trackers is retained in accordance with the retention settings configured in the respective analytics platform (e.g., Google Analytics default retention is set to 14 months) and in accordance with our Privacy Policy. Cookie lifetime and data retention are distinct: the _ga cookie may persist on your device for up to two years, while the analytics data itself is retained for 14 months.

10. Your Rights Under GDPR

Under the GDPR, you have the following rights in relation to personal data collected through Trackers:

Right of access: to obtain confirmation of whether personal data is being processed and to access that data.

Right to rectification: to request correction of inaccurate personal data.

Right to erasure: to request deletion of personal data in certain circumstances.

Right to restriction: to request restriction of processing in certain circumstances.

Right to data portability: to receive personal data in a structured, commonly used format.

Right to object: to object to processing based on legitimate interest.

Right to withdraw consent: to withdraw consent at any time without affecting the lawfulness of prior processing.

Right to lodge a complaint: to file a complaint with the Spanish Data Protection Authority (Agencia Española de Protección de Datos, AEPD) or another competent supervisory authority.

To exercise any of these rights, please contact us using the details provided in Section 12.

11. Changes to This Policy

Pladinum reserves the right to update this Cookie Policy at any time to reflect changes in our practices, technologies, legal requirements, or business operations. Any material changes will be communicated through a prominent notice on the Site and, where appropriate, a refreshed consent prompt via the CookieFirst consent banner.

We encourage you to review this policy periodically. The "Last revised" date at the top of this document indicates when the most recent revision was made.

12. Contact Information

If you have any questions, concerns, or requests regarding this Cookie Policy or our use of Trackers, please contact us:

Company: Pladinum Group SL

Registered in: Spain

Email: privacy@pladinum.com

Website: www.pladinum.com

For complaints regarding the processing of personal data, you may also contact the Spanish Data Protection Authority:

Agencia Española de Protección de Datos (AEPD)

C/ Jorge Juan, 6, 28001 Madrid, Spain

www.aepd.es