

COOKIES POLICY

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This Cookies Policy (“**Policy**”) explains the practices employed by “MultiFi International Ltd Limited” (the “**Company**”, “**we**”, “**our**” and/or “**us**”) regarding the use of ‘cookies’, when providing services to its Clients (“**Client**” and/or “**You**”).

1. IMPORTANT INFORMATION AND WHO WE ARE

A. WHO WE ARE

1.1. “www.multifi.trade” is a domain owned and operated by **MultiFi International Ltd** (formerly *Finatom*), a company incorporated in Mauritius as a Global Business Company, with company file number **C222494**, having its registered office at **Pope Hennessy Street, Suite 803, 8th Floor, Hennessy Tower, Port Louis 11328, Republic of Mauritius**.

1.2. The Company is regulated by the Financial Services Commission (“FSC”) of Mauritius and holds an **Investment Dealer (Full Service Dealer, excluding Underwriting) Licence** under the Securities Act 2005, with licence number **G825204228 (Code: SEC-2.1B)**.

B. PURPOSE OF THIS COOKIES POLICY

1.3. Our ‘**Privacy Policy**’ explains our principles when it comes to the collection, processing, and storage of your information. This ‘**Cookies Policy**’ specifically explains how we, our partners, and users of our services deploy cookies, as well as the options you have to control them.

1.4. This cookies Policy should be read together with our ‘Privacy Policy’, in particular, **paragraph 7** thereof: ‘**Use of Cookies and Other Tracking Technologies**’.

2. WHAT ARE COOKIES?

2.1. Cookies are small pieces of data, stored in text files that are stored on an electronic device when websites are loaded in a browser. They are widely used to “remember” you and your preferences, either for a single visit (through a “**session cookie**”) or for multiple repeat visits (using a “**persistent cookie**”). Persistent cookies are cookies saved on your computer and that are not deleted automatically when you quit your browser, unlike a session cookie, which is deleted when you quit your browser. Persistent cookies ensure a consistent and efficient experience for visitors, and perform essential functions such as allowing users to register and remain logged in.

2.2. Cookies may be set by the site that you are visiting (known as “**first party cookies**” – only that website can read them), or by third parties, such as those who serve content or provide advertising or analytics services on the website (“**third party cookies**”).

- 2.3. Both our website and HTML emails may also contain other tracking technologies such as “**web beacons**” or “**pixels**.” These are typically small transparent images that provide us with statistics, for similar purposes as cookies. They are often used in conjunction with cookies, though they are not stored on your computer in the same way. As a result, if you disable cookies, web beacons may still load, but their functionality will be restricted.

3. HOW WE USE COOKIES

- 3.1. We use cookies for a number of different purposes. Some cookies are necessary for technical reasons; some enable a personalized experience for both visitors and registered users; and some allow the display of advertising from selected third-party networks. Some of these cookies may be set when a page is loaded, or when a visitor takes a particular action (clicking the “**register**” or “**login**” button on a page, for example).
- 3.2. Many of the cookies we use are only set if you are a registered user (to remember your preferences - such as username, language, etc. - for a certain period of time, so you don’t have to log in every time, for example), while others are set whenever you visit our website, irrespective of whether you have an account.
- 3.3. For more information on the choices, you have about the cookies we use, please see the Controlling Cookies section below.

4. WHERE WE PLACE COOKIES

- 4.1. We set cookies in a number of different locations across our services. These include:
- On our website (our “**Site**” - <https://www.multifi.trade>).
 - In the administrative dashboards of our websites.
 - On landing pages, we host.
 - In the emails we send.
- 4.2. Our website mostly uses “**first-party cookies**”. These are cookies set and controlled by us, not by any third party.

5. TYPES OF COOKIES WE USE

- 5.1. The **3 types of first-party cookie** we use are to:
- visitor preferences

- make our Site operational
- gather analytics data (about visitor behavior)

A. VISITOR PREFERENCES

5.2. These cookies are set by us and only we can read them. They remember:

- if you have agreed to (or refused) this site's cookie policy
- if you have already replied to our survey pop-up (about how helpful the site content was) – so you won't be asked again.

B. OPERATIONAL COOKIES

5.3. There are some cookies that we have to include in order for certain web pages to function. For this reason, they do not require your consent. In particular:

- **authentication cookies**
- **technical cookies** required by certain IT systems.

C. AUTHENTICATION COOKIES

5.4. These are stored when you log in to our Site, using our authentication service. When you do this, you accept the terms of our [Privacy Policy](#).

D. ANALYTICS COOKIES

5.5. We use these only for internal research on how we can improve the service we provide for all our users. The cookies simply assess how you interact with our Site – as an anonymous user (the data gathered does not identify you personally).

5.6. Also, this data is not shared with any third parties or used for any other purpose. The anonymized statistics could be shared with contractors working on communication projects under a contractual agreement with us.

6. THIRD-PARTY COOKIES

6.1. Some of our pages display content from external providers, *e.g.*, YouTube, Facebook and Twitter.

6.2. To view this third-party content, you first have to accept their specific terms and conditions. This includes their cookie policies, which we have no control over.

6.3. But if you do not view this content, no third-party cookies are installed on your device. Third-party providers on our Site include the following:

- [You Tube](#)
- [Twitter](#)
- [Facebook](#)
- [Google](#)
- [LinkedIn](#)

- 6.4. These third-party services are outside of our control. Providers may, at any time, change their terms of service, purpose and use of cookies, etc.

7. CATEGORIES OF COOKIE USED ON OUR SITE

- 7.1. The table below explains the various cookies we use on our Site why we use them.

Category of cookies	Why we use these cookies
Strictly Necessary (Essential) Cookies	These cookies are essential for our websites and services to perform basic functions and are necessary for us to operate certain features. These include those required to allow registered users to authenticate and perform account-related functions, store preferences set by users such as account name, language, and location, and ensure our services are operating properly. Because these cookies are strictly necessary to deliver our Site, you cannot refuse them without impacting how our Site functions. You can block or delete them by changing your browser settings, as described under the ‘Controlling Cookies’ section below.
Performance and Functionality Cookies	These cookies allow us to optimize performance by collecting information on how users interact with our websites, including which pages are visited most, as well as other analytical data. We use these details to improve how our websites function and to understand how users interact with them. Although important to us, these cookies are non-essential to the use of our Site. However, without these cookies, certain functionality may become unavailable.
Analytics and Customization Cookies	These cookies collect information that is used either to help us understand how our Site is being used or how effective our marketing campaigns are, or to help us customize our Site and application for you in order to enhance your experience. These cookies may be set by us or by third-party providers whose services we have added to our pages.

Advertising (Targeting) Cookies	These cookies are set by us and our advertising partners to provide you with relevant content and to understand that content's effectiveness. They also perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed and, in some cases, selecting advertisements that are based on your interests. They may be used to collect information about your online activities over time and across different websites to predict your preferences and to display more relevant advertisements to you. These cookies also allow a profile to be built about you and your interests and enable personalized ads to be shown to you based on your profile. For further information, see the 'Controlling Cookies' section below
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7.2. The various first and third-party cookies served through our Site and the purposes they perform are described in further detail below:

Strictly Necessary Cookies			
Cookie Subgroup	Cookies	Cookies used	Lifespan
www.multifi.trade	, _gat_UA- nnnnnnn-nn. _ga , TAG_ASSISTAN T , _gat_gid , AMP_TOKEN ,	First Party	a few seconds, 730 days, Session, a few seconds, 90 days, a few seconds, 180 days,

Strictly Necessary Cookies			
Cookie Subgroup	Cookies	Cookies used	Lifespan
cloudflare.com	_____cfduid	Third Party	30 days

Performance Cookies

Cookie Subgroup	Cookies	Cookies used	Lifespan
seznam.cz	sid	Third Party	30 days
mailerlite.com	_____cfduid	Third Party	30 days
mc.yandex.ru	metrika_enabled, yabs-sid	Third Party	Session, Session
www.multifi.trade	_ym_uid, MgidSensorUtmSource, MgidSensorNVis, MgidSensorUtmCampaign, _ym_d, MgidSensorHref, _ym_metrika_enabled, outbrain_cid_fetch, _ym_visorc, metrika_enabled, MgidSensorUtmMedium, _gclxxxx, _uetvid, _ym_isad, _ym_metrika_enabled_xxxxxx, MgidSensorUtm, _hjAbsoluteSessionInProgress, _hjFirstSeen, _gac_U	Third Party	365 days, 90 days, 90 days, 90 days, 365 days, 90 days, a few seconds, a few seconds, a few seconds, a few seconds, 90 days, 90 days, 16 days, 1 day, a few seconds, 90 days, a few seconds, a few seconds, 90 days, 365 days, 90 days, a few seconds

Performance Cookies			
Cookie Subgroup	Cookies	Cookies used	Lifespan
	A-xxxxxxxx, _hjid, _gaexp, _hjIncludedInPageviewSample		
mgid.com	_____cf_bm, _____cfduid, muidn	Third Party	a few seconds, 1487 days, 90 days

a.mgid.com	MgidSensorUtmCampaign, MgidSensorNVis, MgidSensorUtm, MgidSensorUtmMedium, MgidSensorHref, MgidSensorUtmSource	Third Party	90 days, 90 days, 90 days, 90 days, 90 days, 90 days
tr.outbrain.com	outbrain_cid_fetch	Third Party	a few seconds

Getting Cookies			
Cookie Subgroup	Cookies	Cookie Domain	Cookie Expiration
g.com	ID	rd Party	days
dex.ru	yxex, yandexuid	rd Party	0 days, 365 days, 365 days
c.outbrain.com	CookieJartestCookie	rd Party	ay
book.com		rd Party	days
oo.com	A3	rd Party	days, 365 days
witch.net	d, tuuid_lu, c	rd Party	days, 365 days, 365 days
edin.com	, UserMatchHistory, AnalyticsSyncHistory, sc, bcookie, lang	rd Party	ay, 30 days, 30 days, 365 days, 730 days, Session
ola.com	d	rd Party	days
linkedin.com	g	rd Party	sion
rain.com	, obuid	rd Party	days, 90 days
w.linkedin.com	ookie	rd Party	days

c.criteo.net	eo_write_test	rd Party	w seconds
tube.com	ITOR_INFO1_LIVE, C, CONSENT	rd Party	days, Session, 6102 days
.com	d	rd Party	days
.com	_detect, remixstid, _lvid, tmr_reqNum, ixir, tmr_tcdhn,	rd Party	y, 358 days, 333 days, 333 days, a few onds, a few seconds, 333 days, 375 days

Cookie Subgroup	Cookies	Cookie id	Expirespan
	_lvidTS, remixlang		
.net		rd Party	days
bleclick.net	_cookie, IDE	rd Party	w seconds, 390 days
w.multifi.trade	tld_test, _bundle, ar_v4, _te_, adroll_fpc, _fbp, tsid, eo_write_test, adroll_consent_ ams, n_mp2_substs_ xxxxxx, n_mp2_track_xx xxxxx	rd Party	w seconds, 395 days, 365 days, Session, 365 s, 90 days, 1 day, a few seconds, a few seconds, w seconds, a few seconds

oll.com	adroll_shared	rd Party	days
matic.com	BMDCID, TBCOOKIE_xxxx, PugT	rd Party	days, 400 days, 30 days
lemedia.com	PRO, CMID, CMPS, ST, CMRUM3	rd Party	days, 365 days, 90 days, 1 day, 365 days
roll.com	adroll	rd Party	days
tfer.com	sonalization_id	rd Party	ears

8. OTHER TRACKING TECHNOLOGIES

- 8.1. We may use other, similar technologies from time to time, like web beacons, SDKs, pixels (or “**clear gifs**”) and other tracking technologies.
- 8.2. Pixels are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Site or, in the case of web beacons, opened an email that we have sent them. This allows us, for example, to monitor the traffic patterns of visitors from one page within our Site to another, to deliver or communicate with cookies, to understand whether you have come to our Site from an online advertisement displayed on a landing page or third-party website, to serve targeted advertisements to you and others like you, to improve site performance, and to measure the success of marketing campaigns.
- 8.3. We automatically place single pixel gifs, also known as web beacons, in every email sent by our registered users. These are tiny graphic files that contain unique identifiers that enable us and our registered users to recognize when their contacts have opened an email or clicked certain links. These technologies record each contact’s email address, IP address, date, and time associated with each open and click for a campaign. We use this data to create reports for our registered users about how an email campaign performed and what actions contacts took.
- 8.4. While you may not have the ability to specifically reject or disable these tracking technologies, in many instances, these technologies are reliant on cookies to function properly; accordingly, in those instances, declining cookies will impair the functionality of these technologies.

9. CONTROLLING COOKIES

A. YOUR RIGHT TO ACCEPT OR REJECT COOKIES

- 9.1. You have the right to decide whether to accept or reject cookies.
- 9.2. You may wish to restrict the use of cookies or completely prevent them from being set. Most browsers provide ways to control cookie behavior such as the length of time they are stored – either through built-in functionality or by utilizing third party plugins. If you disable cookies, please be aware that some of the features of our service may not function correctly.

B. REMOVING COOKIES FROM YOUR DEVICE

- 9.3. You can delete all cookies that are already on your device by clearing the browsing history of your browser. This will remove all cookies from all websites you have visited. Be aware though that you may also lose some saved information (e.g. saved login details, site preferences).

C. BROWSER CONTROLS

- 9.4. You can set or amend your web browser controls to accept or refuse cookies. You can set most modern browsers to prevent any cookies being placed on your device, but you may then have to manually adjust some preferences every time you visit a site/page. Moreover, some services and functionalities may not work properly at all (e.g. profile logging-in). Accordingly, if you choose to reject cookies, you may still use our Site, though your access to some functionality and areas of our Site may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

D. Managing and deleting cookies

- 9.5. To find out more on how to manage and delete cookies, visit aboutcookies.org. For more details on your choices regarding use of your web browsing activity for interest-based advertising you may visit the following sites:
- networkadvertising.org
 - optout.aboutads.info
 - youradchoices.com
 - youronlinechoices.eu

E. Mobile Devices

- 9.6. You can opt out of having your mobile device identifiers used for tracking, including tracking performed by us, by accessing the settings in your Apple or

Android mobile device and following the most recent published instructions to adjust your settings to limit tracking. If you opt out, all data about you will be removed and no further data collection or tracking will occur. The random ID we (or our third-party partners) had previously assigned to you will also be removed. This means that if at a later stage, you decide to opt-in, we will not be able to continue and track you using the same ID as before, and you will for all practical purposes be a new end user to our system.

F. Removing Analytics and Customization Cookies

- 9.7. In order to understand better how our services are used, we monitor certain user activities that take place within our Site, including page views and clicks on any links used when managing a site via our dashboards.
- 9.8. We call each one of these actions an “event.” Analytics events are attached to your account with us and are handled via a first party system that we own and maintain. In general, we record the following data for each event: IP address, user ID and username, user agent, referring URL, time stamp of event, browser language, and country code.
- 9.9. We use this information to improve our products, make our marketing to you more relevant, personalize your experience, and for the other purposes described in our Privacy Policy.
- 9.10. You may opt out of our analytics program through your user settings. By doing so, you won’t share information with our analytics tool about events or actions that happen after the opt-out, while logged in to your account. Note that opting out does not disable the functionality of the actions we track – for example, if you publish a post, we will still have record of that (don’t worry!), but for an event or action after you opt out, we will not have other data associated with that action or event in the analytics tool.
- 9.11. Some analytics services we use, which place their own cookies or web tags on your browser, offer their own opt out choices. For example, you can opt out of Google Analytics by installing [Google’s opt-out browser add-on](#).

G. Do Not Track

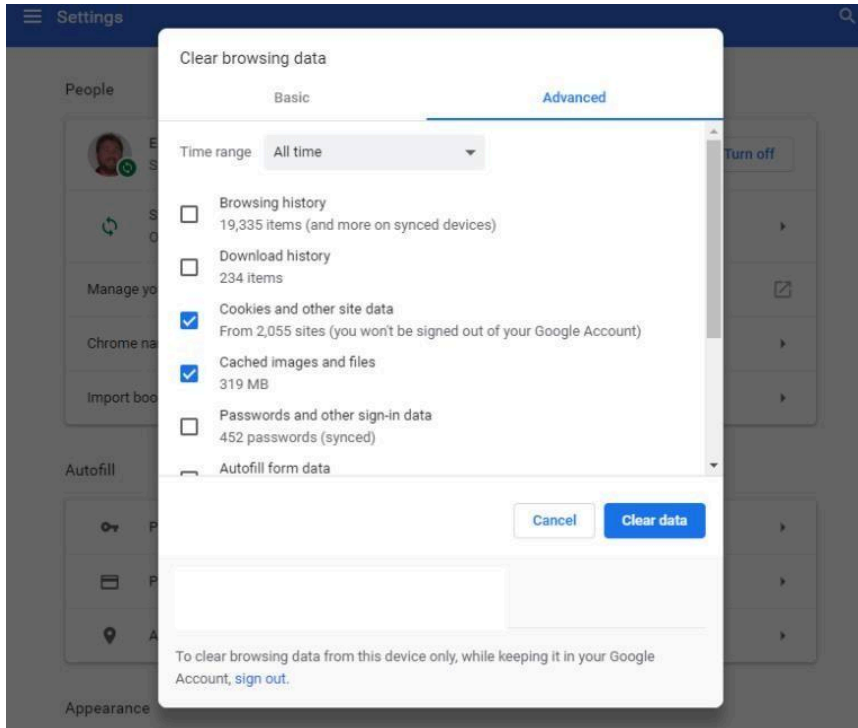
- 9.12. Some Internet browsers - like Internet Explorer, Firefox, and Safari - include the ability to transmit “Do Not Track” or “DNT” signals. Since uniform standards for “DNT” signals have not been adopted, our Site and Landing Pages do not currently process or respond to “DNT” signals. We take privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.
- 9.13. To learn more about “DNT”, please visit: [All About Do Not Track](#).

H. How to Control And Delete Cookies On The Most Commonly Used Browsers

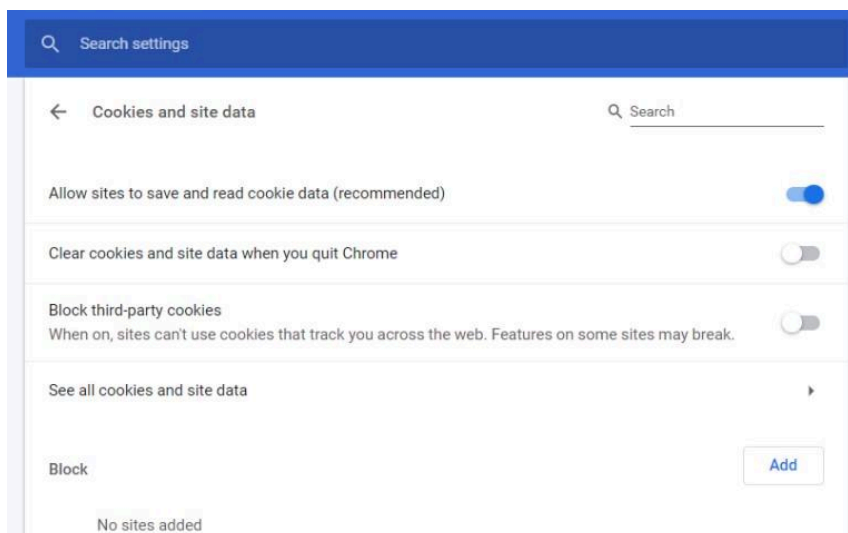
- 9.14. An overview of how you can limit the cookies you receive via the he built-in controls in the most commonly used browsers, is set out below:

a. Google Chrome (Desktop)

- 9.15. Click the three-dot icon menu in the upper-right corner to get the Chrome menu, and select More tools > Clear browsing data. In the pop-up box, check off the third and fourth boxes to delete cookies and clear-cached images and files. Just pick a time frame from the menu at the top.



- 9.16. To manage the cookies in Chrome, type "chrome://settings/content/cookies" in the omnibox (without the quote marks).
- 9.17. Tell Chrome to allow data from local sites you actually visit, only keep data until you close the browser, or block cookies altogether:
- (i) **First option:** Block all third-party cookies.
 - (ii) **Second option:** You can also set exceptions—if you block all cookies, you might nonetheless wish to allow them for, say, www.multifi.trade just so you do not have to re-type your password all the time.



9.18. Click **See All Cookies and Site Data** to see a list of the cookies actually installed locally on your computer. You can go through them one by one and delete as desired.

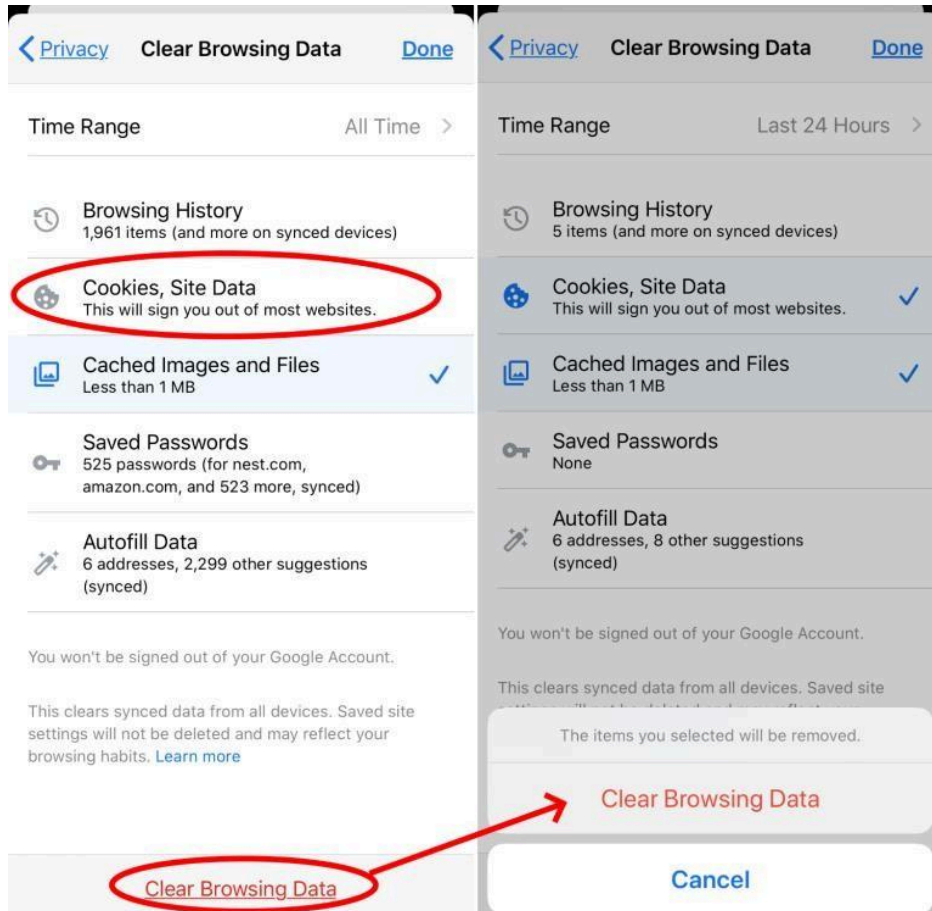
b. Google Chrome (Mobile)

9.19. Access the menu via the ellipsis menu in the lower right (iOS) or upper-right (Android) and select Settings > Privacy > Clear Browsing Data.

9.20. Check off the section for cookies and tap Clear Browsing Data (iOS) or Clear Data (Android).

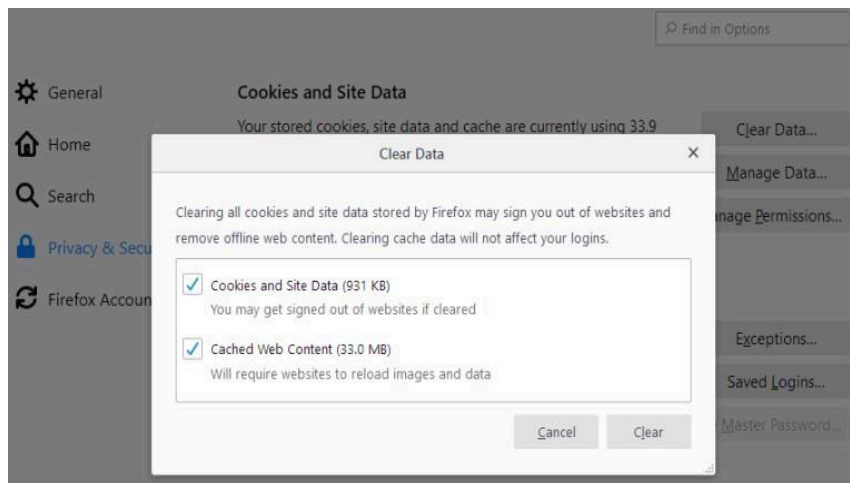
9.21. That is all you can do; you do not get any granular controls over existing cookies (except for selecting a time frame at the top) and cannot block third-party cookies alone.

9.22. See Screenshot below:



c. Mozilla Firefox

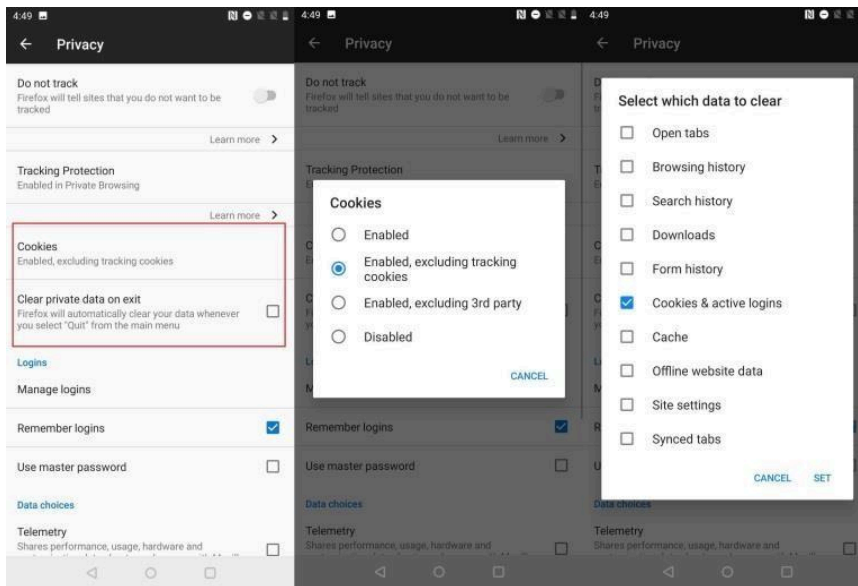
- 9.23. Click the upper-right hamburger stack and select **Options > Privacy & Security**.
- 9.24. Under Cookies and Site Data, click **Clear Data > Cookies and Site Data > Clear** to remove your entire cookie history.



- 9.25. Go back to **Cookies** and Site Data, select **Manage Data** if you want to choose the sites from which to remove cookies.
- 9.26. There is also a checkbox to **delete cookies and site data when Firefox is closed**. However, that may be over kill.
- 9.27. Under **Manage Exceptions**, you can create **Exceptions** to accept cookies always (or never) from select sites.

d. Firefox (Android)

- 9.28. Go to the three-dot menu and select Settings > Privacy > Cookies. You get three choices:
 - (i) Enabled;
 - (ii) Enabled Excluding 3rd Party; or
 - (iii) Disabled.
- 9.29. To erase all cookies, on the Privacy screen, check the box by Clear Private Data on Exit. You will get another pop-up to pick Cookies & Active Logins, among other settings.
- 9.30. See Screenshot below:

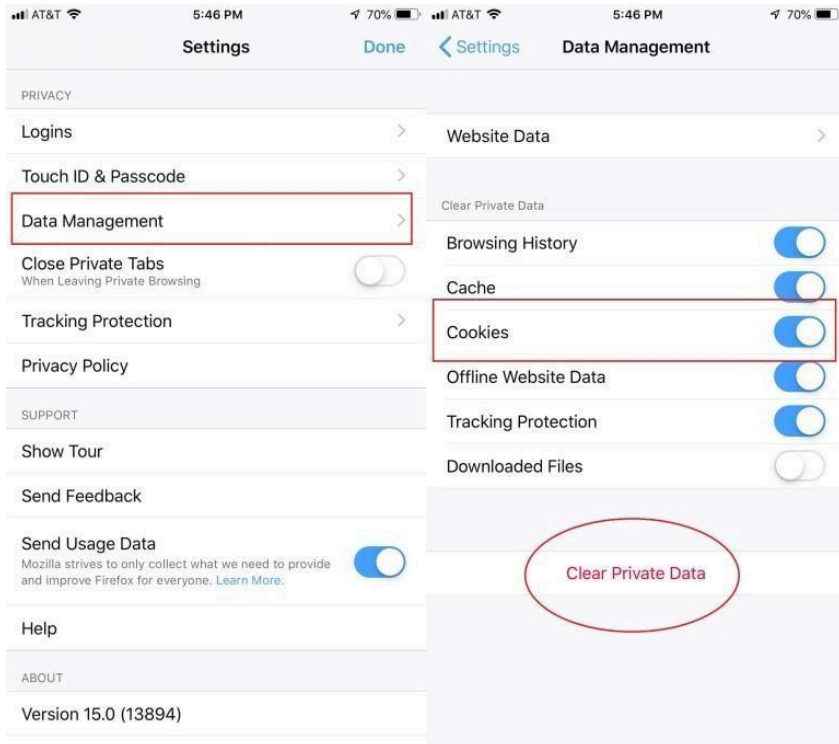


e. Firefox (IOS)

- 9.31. Tap the hamburger menu on the lower right, select **Settings >Tracking Protection**. Select Standard or Strict. The latter is *de-facto* a private browsing mode.
- 9.32. For true cookie control, go to **Settings > Data Management > Cookies** and turn them off.

9.33. You can Clear Private Data at the bottom of the screen, or click Website Data at the top to delete cookie data site by site.

9.34. See Screenshot below:



f. Microsoft Edge

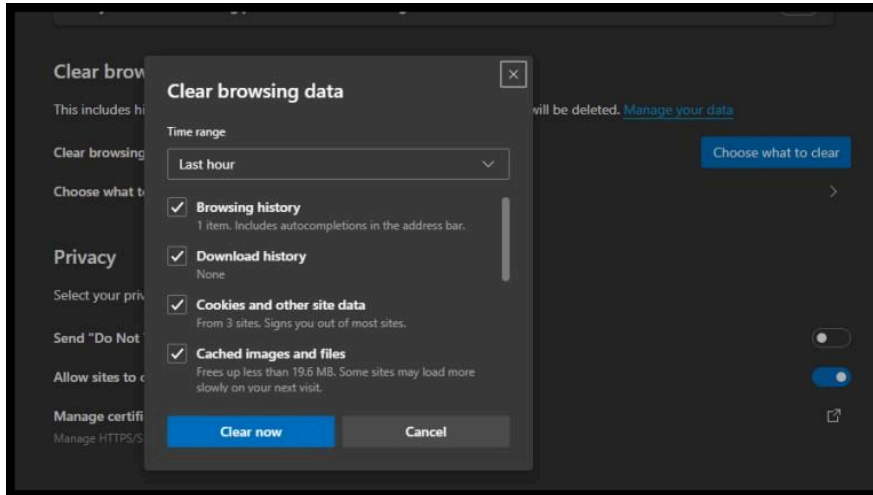
9.35. Internet Explorer is discontinued and has been replaced by Microsoft Edge.

9.36. To clear cookies, select the three-dot menu and select Settings. Click the hamburger menu on the top left and select **Privacy and services**.

9.37. Under Clear browsing data, click **Choose what to clear**. Some options will be pre-selected; can click or de-select the items you want to delete. Click **Clear now**.

9.38. Back under Clear browsing data, you can also choose what gets cleared every time you close the browser.

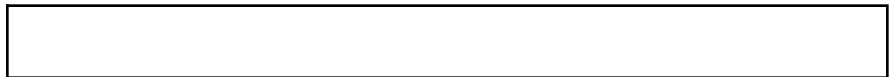
9.39. See Screenshot below:



9.40. To manage cookies in the future, scroll up to Tracking Prevention. Choose one of three options: Basic, Balanced, or Strict. You can also see blocked trackers and set exceptions.

g. Safari (MacOs)

9.41.



By default, Safari is only taking cookies from sites you visit—not third-party cookies. You can make changes by going to the Safari menu (a gear icon) and selecting **Preferences > Privacy** and looking under **Cookies and website data > Manage Website Data**. From there, pick the sites whose cookies you crush; click **Remove All > Remove Now** to kill all cookies.

9.42. If you would like to manage how Safari handles cookies, look for the option to **Block All Cookies** on that same Privacy tab.

- 9.43. To manage the cookies Safari will accept, click any site under **Cookies and Website data** to have Safari ask sites and third parties not to track you. Safari may ask on your behalf every time, but it is up to individual websites whether they will comply or not.

h. Safari (IOS)

- 9.44.

With Safari, you do not access the cookie settings by opening the browser itself. In iOS, go to **Settings > Safari** and toggle **Block All Cookies** to on.

- 9.45. To clear all cookies, choose **Clear History and Website Data**. To clear only select cookie data stored by websites (and keep your History), scroll down to **Advanced > Website Data**. You will get a list of the sites storing the most data; at the bottom of the list click **Show All Sites** to see the full list. Delete the data for sites you do not recognize or trust by swiping left; you will sleep better. Clear them all by clicking **Remove All Website Data** at the bottom.

10. UPDATING OF THIS COOKIE POLICY

- 10.1. We may update this Cookie Statement from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. It is therefore recommended to re-visit this Cookie Statement regularly to stay informed about our use of cookies and related technologies.
- 10.2. The date indicated in the ‘version Log’ at the beginning of this Cookie Policy indicates when it was last updated.

11. CONTACT US

- 11.1. If you have any questions about our use of cookies, you can find the most relevant contact details in our Privacy Policy.