

GLOBAL COOKIE AND TRACKING POLICY

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Regulatory Scope: Global E-Commerce Platform

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1. INTRODUCTION TO COOKIES AND TRACKING TECHNOLOGIES

1.1. What are Cookies?: Cookies are small data files consisting of letters and numbers that are downloaded and placed on your computer, tablet, mobile phone, or other internet-enabled device when you visit our website. WAWLYN uses cookies, web beacons, tracking pixels, local storage (HTML5), and similar telemetry technologies to ensure our website functions correctly, to secure user sessions, and to optimize the delivery of content across our global edge network.

1.2. Purpose of this Policy: This Global Cookie and Tracking Policy provides you with clear, comprehensive, and transparent information about the cookies we use and the purposes for using them. This policy is designed to fully comply with the EU ePrivacy Directive (PECR in the UK), the GDPR, the CCPA/CPRA, and other relevant global privacy legislation.

2. CATEGORIES OF COOKIES WE DEPLOY

Our platform utilizes different categories of cookies, which are deployed across our Vercel-hosted architecture. These are categorized by their functionality and necessity:

2.1. Strictly Necessary Cookies (Essential): These cookies are absolutely critical for the operation of the WAWLYN website. They enable core functionality such as page navigation, load balancing, accessing secure areas of the website (e.g., your WAWLYN account dashboard), and managing shopping cart sessions during the e-commerce checkout process. Because our authentication layer is handled by Supabase, essential JSON Web Tokens (JWT) and session identifiers are stored securely to maintain your logged-in state. You cannot opt-out of these cookies, as the website cannot function properly without them.

2.2. Performance and Analytics Cookies: These cookies collect information about how visitors use our website, for instance, which pages visitors go to most often, where they came from, and if they encounter error messages from web pages. WAWLYN leverages Vercel Web Analytics and Google Analytics to measure edge-network performance, identify routing bottlenecks, analyze time-to-first-byte (TTFB) metrics, and understand user journeys. These cookies do not collect information that directly identifies a visitor; all data is aggregated and pseudonymous.

2.3. Functional Cookies: These cookies allow the website to remember choices you make (such as your user name, preferred language, currency selection, or the region you are in) and provide enhanced, more personal features. They may also be used to provide services you have asked for, such as watching an embedded video of the Wyn Pad in action or engaging with our live customer support chat widget. If you do not allow these cookies, some or all of these services may not function properly.

2.4. Targeting and Advertising Cookies: These cookies are used to deliver advertisements more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by third-party advertising networks with our permission. They remember that you have visited a website and this information is shared with other organizations such as advertisers. These cookies are strictly opt-in under European and Californian regulations.

3. FIRST-PARTY VS. THIRD-PARTY COOKIES

3.1. First-Party Cookies: These are cookies set directly by the WAWLYN domain you are visiting (e.g., wawlyn.com). They are primarily used to maintain session state, secure your connection via TLS, remember your shopping cart contents, and save your cookie consent preferences.

3.2. Third-Party Cookies: In many cases, we also use cookies provided by trusted third parties. For example, when you proceed to checkout, our payment processors (such as Stripe or Apple Pay) deploy secure, strictly necessary cookies to detect and prevent fraudulent transactions, assess device risk, and process payments securely in compliance with strict PCI-DSS regulations. Other third-party cookies include those from social media platforms (e.g., Facebook Pixel) or video hosting platforms (e.g., YouTube embedded players) which may track your usage if you interact with their widgets on our site.

4. SESSION VS. PERSISTENT COOKIES

4.1. Session Cookies: These cookies are temporary and expire once you close your browser or once your session times out. We use session cookies to maintain your shopping cart, preserve form data during checkout, and maintain security during a single browsing session.

4.2. Persistent Cookies: This category encompasses all cookies that remain on your hard drive until you manually erase them or your browser deletes them based on the cookie's specific expiration date. All persistent cookies have an expiration date written into their code. We use persistent cookies to remember your preferences (like your language choice and cookie consent choices) for your next visit, so you do not have to re-enter them.

5. PIXEL TAGS, WEB BEACONS, AND LOCAL STORAGE

5.1. Beyond standard cookies, WAWLYN utilizes Web Beacons (also known as clear GIFs or pixel tags) in our marketing emails. These tiny invisible images help us determine whether our emails have been opened and which links were clicked, allowing us to gauge the effectiveness of our communications.

5.2. HTML5 Local Storage: We also use local storage to cache application data on your browser to improve website loading speeds and performance, especially when interacting with our dynamic Vercel-hosted frontend.

6. MANAGING YOUR COOKIE PREFERENCES AND CONSENT

6.1. Consent Mechanism: Upon your first visit to the WAWLYN website from a regulated jurisdiction (e.g., the EU, UK, or California), you will be presented with a comprehensive Cookie Consent Banner. By law, we only deploy Strictly Necessary Cookies by default. You must

explicitly opt-in (give affirmative consent) for the deployment of Performance, Functional, and Targeting cookies.

6.2. **Withdrawing Consent:** You have the absolute right to decide whether to accept or reject cookies. You can amend your preferences or withdraw consent at any time by clicking the 'Cookie Settings' or 'Do Not Sell/Share' link located in the footer of our website. This will bring up the consent module, allowing you to toggle specific cookie categories on or off.

6.3. **Browser Controls:** In addition to our consent manager, you can set or amend your web browser controls (Chrome, Safari, Firefox, Edge) to accept or refuse cookies globally. If you choose to reject strictly necessary cookies via your browser settings, your access to certain functionality and areas of our website (such as account login, accessing WAWLYN Rewards, and the e-commerce checkout) will be severely degraded or completely non-functional.

6.4. **Global Privacy Control (GPC) and Do Not Track (DNT):** Our platform respects Global Privacy Control (GPC) signals sent from supported browsers, automatically treating them as a request to opt-out of targeting cookies. We also monitor traditional Do Not Track headers.

7. POLICY UPDATES AND CONTACT INFORMATION

7.1. **Updates:** We may update this Global Cookie and Tracking Policy from time to time in order to reflect changes to the cookies we use (e.g., if we implement new analytics tools on our Vercel infrastructure or change advertising partners) or for other operational, legal, or regulatory reasons.

7.2. **Contact:** If you have any questions about our use of cookies or other technologies, please contact our privacy compliance team via email at admin@wawlyn.com.