

# COOKIE STATEMENT

JGL STRATEGIC SOLUTIONS  
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## 1. MAPPING YOUR VISIT OF OUR WEBSITE

### A. COOKIES

- i. A cookie is a small text file that is stored by the browser of your computer, tablet or smartphone when you first visit this website.
- ii. JGL Strategic Solutions uses different types of cookies:
  - a. Functional cookies: These are cookies with a purely technical functionality. These ensure that the website works properly, so that it can, for example, remember your preferred settings. Using these, we can also optimize our website and the services through our website.
  - b. Analytic cookies by third parties: These cookies can keep track of your online behaviour. These cookies are used by Google Analytics.
  - c. Tracking cookies: These cookies are placed by an external party. By reading these cookies the advertiser recognizes you when you visit a site in which he is also involved. If you continue browsing, personalized ads can be shown. These cookies can also keep track of your online behaviour, which may result in a very specific profile being built by these parties. This profile can be so detailed that it is considered personal data.

### B. CHANGE COOKIE SETTINGS

- i. Your cookie settings were set by you on your first visit to our website. All non-functional cookies can be denied per category. Placement of cookies, other than functional or anonymous analytical cookies, takes place only after an active action by you as a visitor. You can change your settings at any time via our website

### C. LEGAL BASIS OF DATA PROCESSING

- i. Functional cookies: The basis for processing functional cookies is the legitimate interest of JGL Strategic Solutions. The interest of JGL Strategic Solutions is based on the need to ensure proper functioning of the website. However, the user's interest in maintaining his or her privacy is not exceeded, as functional cookies do not collect personal data that can be used for marketing or other purposes.
- ii. Analytical and tracking cookies: The basis for processing analytical and tracking cookies concerns the consent given to JGL Strategic Solutions}. This article provides that the processing of personal data is only allowed if the data subject has given his or her unambiguous consent. The requested consent gives you, the user, control over your personal data and provides transparency on how this data is used.

## 2. COOKIE OVERVIEW

### A. COOKIE NAME, COOKIE TYPE, COOKIE FUNCTION AND THE RETENTION PERIOD

- i. The different types of cookies that the JGL Strategic Solutions website uses are shown in the table below.
- ii. On vivacity-funds.lu, there are a total of 8 different cookies. The following cookies are placed on the visitor's hard drive when you visit the JGL Strategic Solutions website:

### B. COOKIE TABLE

Name	Type(s)	Cookies	Duration
Cloudflare	Functional	__cfduid	1 months

Cloudflare is a platform that improves the performance and security of websites. These cookies identify and track the user, among other things to run a load balancer and a bot manager. A cookie is also used to determine whether web traffic is trusted. This processing takes place in the United States of America.

CookieCode	Functional	PraivacyAudit	1 years
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CookieCode	Functional	PraivacyCookieConsent	1 years
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The PraivacyCookieConsent cookie records your preferences with regard to allowing cookies. With the PraivacyAudit cookie you can later retrieve, in an anonymous way, what permission you have given for the placement of cookies.

Google Analytics	Analytical	_ga	2 years
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Google Analytics	Analytical	_ga_CL8DQ1GBH6	2 years
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Google Analytics	Analytical	_gat_UA-121794373-1	End of session
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Google Analytics	Analytical	_gid	23 hours
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These cookies are set by Google Analytics. These cookies give us a better picture of visitor behaviour on the website. This is used to improve the user experience on the website. This processing takes place in the United States of America.

Site Cookies (Functioneel)	Functional	PHPSESSID	End of session
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These cookies keep up data entered on the website, so that the use of the website is easier for the user. This may include login data, data that is entered on forms and saving preferences.

## 3. GOOGLE ANALYTICS

### A. GOOGLE

- i. A cookie from Google is set via our website. These cookies are part of Google Analytics. We use this service to examine how you, as a visitor, use our website and Google produces insightful reports on this for us.
- ii. Google may provide this information to third parties if Google is legally obliged to do so, or if third parties process the information on behalf of Google. JGL Strategic Solutions has no influence on this.
- iii. You can read here (<https://policies.google.com/technologies/partner-sites?hl=en>) how Google uses your personal data and for what purposes it is used.

## **B. PRIVACY SETTINGS**

- i. Through this cookie statement, we inform you about the use of Google Analytics.
- ii. JGL Strategic Solutions has entered into a processing agreement with Google;
- iii. Google Signals is used. This feature gives us greater insight into the behaviour of our visitors on different devices;
- iv. Data collected is linked to other Google services;
- v. Your IP address is anonymised so that your location is not traceable.

## **4. THIRD PARTIES' WEBSITES AND AMENDMENTS**

- i. This cookie statement does not apply to third-party websites linked to our website. It is not possible for JGL Strategic Solutions to guarantee that these third parties handle your personal data in a reliable and secure manner. However, JGL Strategic Solutions is committed to ensuring the same level of security of your data.
- ii. Always consult these websites' privacy statement before using these websites.
- iii. A known third party is Google, read here (<https://business.safety.google/privacy/>) they also handle personal data.
- iv. This cookie statement is subject to change. When it is changed, you will be asked again to give permission to place the modified cookies. The current version of this cookie statement is 20250102.

## **5. ACCESSING, ADJUSTING OR DELETING YOUR DATA**

### **A. YOUR RIGHTS**

- i. You have the right to
  - a. access your personal data,
  - b. request an adjustment of your data
  - c. request that less of your data be processed by us,
  - d. apply for the removal of your data,
  - e. have your data transferred to someone else and
  - f. file a complaint as described in article 6.
- ii. If you have any questions or comments about the way JGL Strategic Solutions processes your data, please send them to [info@vivacity-funds.lu](mailto:info@vivacity-funds.lu).
- iii. JGL Strategic Solutions wants to be sure that the request has been made by you. That is why we kindly ask that you, along with your request for access, correction or removal, send us a copy of your ID. To protect your privacy, JGL Strategic Solutions asks you to cover your photo, MRZ (machine readable zone, the strip with numbers at the bottom of the passport), document number and citizen service number/social security number in this copy.
- iv. JGL Strategic Solutions will respond to your request as soon as possible, but at least within four weeks.

## **6. RIGHT TO COMPLAIN**

### **A. INTERNAL HANDLING**

- i. If you have any complaints about the processing of (personal) data, JGL Strategic Solutions would like to clear the air with you in mutual consultation. Please send your complaint to [info@vivacity-funds.lu](mailto:info@vivacity-funds.lu).

## **B. DATA PROTECTION AUTHORITY**

- i. Based on the General Data Protection Regulation, you have the right to submit a complaint to your own Data Protection Authority about our processing of your personal data. You can contact the lead supervisory authority of JGL Strategic Solutions, which is the Dutch DPA (Autoriteit Persoonsgegevens). For more information on your right to complain, please visit the Dutch DPA's website: <https://autoriteitpersoonsgegevens.nl/en>.