

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. Cookie notification and what to do when you don't like cookies

- 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

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 7 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.			
CookieCode	Functional	PraivacyAudit PraivacyCookieConsent	1 years 1 years
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 (anon.)	Analytical (anonymous)		
Google uses the _ga cookie to give the website administrator an idea of the visitor flow through the Google Analytics service. The _gat cookie ensures that an unlimited number of requests to transfer data can't be sent. Your IP address is masked, which means that you, as a visitor, remain anonymous.			
Site Cookies	Functional	PHPSESSID	End of session
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. Through our website cookies are placed by a company called Google. These cookies are part of the "Analytics" service. We use this service to investigate how you as a visitor use our website. Google makes insightful reports about 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.

B. Privacy settings

- i. By means of this cookie statement we inform you about the use of this type of cookie.
- ii. JGL Strategic Solutions has concluded a processor agreement with Google.
- iii. The information that Google collects is anonymized as much as possible. We used IP-masking, so that your location is not traceable.
- iv. We prohibited Google to use the gathered data for other products and services by Google companies (like e.g. AdWords and DoubleClick)

4. THIRD PARTIES' WEBSITES AND AMENDMENTS

A. This privacy and cookie statement does not apply

- i. To websites of third parties that are linked to on 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. 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 20210302.

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.
- 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 **black out** 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.

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>.