

CFIX Cookie Policy

C F I X VIRTUAL ASSETS BROKER & DEALER SERVICES L.L.C S.O.C (“CFIX”, “We”, “Us”) is a newly formed crypto broker-dealer based in the UAE, functioning under the regulatory framework set by the Dubai Virtual Assets Regulatory Authority (VARA) – holding a registered Trade License Number (**1501218**). The company is incorporated in the United Arab Emirates, with its registered office located at **Office 704, International Business Tower, Business Bay, Dubai, UAE**. As a Broker-Dealer, the Company focuses exclusively on providing services related to OTC, Limit Orders and Spot in compliance with VARA’s regulatory framework.

This Cookie Policy explains how **CFIX** (“we”, “us”, “our”) uses cookies and similar tracking technologies on our website and online services. It outlines what cookies are, how and why we use them, and how you can manage your preferences in accordance with applicable laws, including **UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data**, and the **Dubai Virtual Assets Regulatory Authority (VARA) Data Protection Rulebook**.

1. INTRODUCTION TO COOKIES

Cookies are small text files that are placed on your device (computer, tablet, smartphone, etc.) when you visit a website. They serve various purposes, such as enabling website functionality, analyzing website performance, remembering user preferences, and delivering relevant advertisements.

Cookies may be either:

- Session Cookies, which expire when you close your browser, or
- Persistent Cookies, which remain stored on your device for a predefined period or until manually deleted.

This Policy provides details on:

- The nature and types of cookies we use;
- The purposes for which cookies are deployed;
- Your rights and choices concerning these technologies.

Where cookies collect personal data or data that becomes personally identifiable when combined with other information, the [\[CFIX Privacy Policy\]](#) shall apply in conjunction with this Cookie Policy. All capitalized terms not defined herein shall bear the meanings ascribed to them in our [\[Terms and Conditions\]](#).

We reserve the right to amend this Policy at our discretion and will publish updates as necessary. For any queries, please contact our Data Protection team at: dpo@cfix.com

Cookies are generally categorized as:

- **First-party cookies:** Set directly by CFIX.



- **Third-party cookies:** Set by external service providers integrated into our Platform (e.g., analytics tools, advertising platforms).

Most cookies collect aggregated or pseudonymous data, such as browsing patterns or device-related information. More information is available at www.aboutcookies.org or www.allaboutcookies.org.

CFIX's cookie practices fully comply with the VARA Data Protection Rulebook and Federal Decree Law No. 45 of 2021 regarding the Protection of Personal Data in the UAE.

2. TYPES OF COOKIES WE USE

We use the following categories of cookies:

a. Strictly Necessary Cookies

These cookies are essential for the operation of our website and enable you to use its core features, such as logging in, secure browsing, and accessing protected areas. Disabling these may affect website functionality.

b. Performance and Analytics Cookies

These cookies help us understand how visitors interact with our website by collecting aggregated information about traffic sources, page views, and user behavior. They support us in improving site performance and user experience.

c. Functionality Cookies

Functionality cookies remember choices you make (such as language preferences or login credentials) to provide a more personalized experience.

d. Targeting and Advertising Cookies

These cookies track browsing habits and are used to deliver ads that are more relevant to your interests. They may be set through our site by third-party advertising networks with our consent.

3. LEGAL BASIS FOR COOKIE USAGE

Cookies implemented on our Platform serve legitimate business, operational, and security functions. Depending on their nature and purpose, we process cookie-related data under one or more of the following lawful bases:

A. Legitimate Interests

We process specific data where necessary to pursue our legitimate interests—provided such interests are not overridden by your fundamental rights and freedoms:

- **Security and Fraud Detection:** To detect unauthorized access, monitor suspicious activity, and safeguard the integrity of the Platform and its users.

- **Session Management and Platform Stability:** To ensure technical functionality, maintain system performance, and support uninterrupted service delivery.
- **User Identification and Experience Enhancement:** To recognize returning users, maintain authentication states, and remember user preferences to streamline interactions.

B. Contractual Necessity

We collect and use certain cookies to perform the services explicitly requested by you or necessary to fulfill a contractual relationship:

- **Execution of Trading Services and Platform Functions:** To process transactions, access user accounts, route orders, and deliver platform tools and related functionalities.

C. Legal and Regulatory Compliance

We process certain cookies to meet our legal and regulatory obligations under applicable frameworks, including but not limited to VARA and UAE law:

- **Regulatory Monitoring and Compliance Reporting:** To support legal audit trails, detect regulatory breaches, fulfill AML/CFT obligations, and comply with data security mandates applicable to Virtual Asset Service Providers.

D. Consent (Where Required)

For cookies not strictly necessary for the functioning of the Platform, we rely on your explicit, informed consent. You may withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal:

- **Analytics and Insights:** To evaluate platform usage, user behavior, and trading patterns in order to enhance features and tools.
- **Marketing and Personalization:** To provide relevant content, service updates, and promotional communications tailored to your interests and usage patterns.

E. Service Optimization (Hybrid Basis)

Some cookies are used under a combination of legitimate interest and contractual necessity, as they are fundamental to ensuring an optimal experience:

- **Operational Functionality:** To facilitate seamless trade execution, preserve authentication sessions, process user commands, and ensure continuity across system modules.

4. Use of First- and Third-Party Cookies

CFIX employs both first-party and third-party cookies. First-party cookies are directly controlled and configured by CFIX. Third-party cookies, including those used for analytics,

advertising, or integrations, are subject to the respective third-party privacy and cookie policies.

- **Cookie Hardening:**

All CFI-set cookies must specify `Secure; HttpOnly; SameSite=Strict` to prevent client-side script access, cross-site leakages, and ensure encrypted transit.

Categories of Cookies Utilized

CFIX uses the following classes of cookies, categorized by purpose and legal basis:

A. Essential Cookies

- **Purpose:** Ensure basic operational functionality such as account security, trading execution, and secure authentication.
- **Legal Basis:** Legitimate interest, performance of a contract, and legal compliance.
- **Consent:** Not required. These cookies are non-optional and cannot be disabled via browser settings.

B. Session Cookies

- **Purpose:** Facilitate real-time session continuity by storing temporary information that enhances usability during a session.
- **Duration:** Active only during the current session; automatically deleted upon browser closure.
- **Legal Basis:** Legitimate interest, contractual necessity, and (where applicable) user consent.

C. Persistent Cookies

- **Purpose:** Remember user preferences across multiple sessions for a consistent experience.
- **Duration:** Remain stored on the user's device until manually deleted or expired.
- **Legal Basis:** Legitimate interest and user consent (where applicable).
- **Consent:** Users may opt out via cookie settings or browser controls.

D. Tracking & Analytics Cookies

- **Purpose:** Collect aggregated data on user behavior, campaign performance, and platform navigation patterns.
- **Operation:** May include third-party tools such as Google Analytics or equivalent providers.
- **Legal Basis:** Explicit user consent.
- **Consent:** Required before deployment. Not used unless actively accepted by the user.

E. Functional and Performance Cookies

- **Performance & Operational Analytics:** Monitor platform responsiveness, trade latency, and usage patterns for system optimization.
- **Security Cookies:** Identify anomalous activity and protect against cybersecurity risks or unauthorized access.
- **Personalization Cookies:** Enable user-specific features such as saved dashboards, trading alerts, and customized settings.
- **Third-Party Integration Cookies:** Support interoperability with external services including liquidity providers, trading analytics APIs, and system performance dashboards.
- **Legal Basis:** Legitimate interest, contractual necessity, or user consent depending on function.

CFIX ensures that all third-party vendors comply with relevant data protection laws and maintain contractual safeguards, including data processing agreements (DPAs).

5. HOW TO MANAGE YOUR COOKIE PREFERENCES

Upon your first visit to our website, you are presented with a Cookie Banner that allows you to accept, reject, or customize your cookie preferences. You may adjust these preferences at any time by accessing the **“Cookie Settings”** link available on our website footer.

You may also configure your web browser to delete or block cookies. However, this may affect the availability and functionality of certain features.

If you disable cookies, we will no longer collect data through them. However, data collected before disabling may still be processed in line with your original consent.

- **Consent Withdrawal Enforcement:**

Upon withdrawal, CFIx sends an HTTP `Clear-Site-Data: "cookies"` response header on next page load, ensuring all non-essential cookies are removed client-side.

- **No-JS Consent Endpoint:**

Users without JavaScript can POST their cookie preferences to `/api/cookies/consent` with form fields mirroring the banner options. The server sets corresponding flags via HTTP only cookies and returns a confirmation page.

- **UX Integrity Controls:**

The cookie banner and preference center follow ‘no dark-pattern’ guidelines: no pre-selected non-essential cookies, equivalent prominence for Accept/Reject, and explicit “Reject All” option. Quarterly UX audits ensure compliance with transparency principles.

6. CONSENT MANAGEMENT PLATFORM (CMP)



CFIX utilizes a certified Consent Management Platform (CMP) that complies with global privacy standards, including IAB Europe's Transparency and Consent Framework (TCF) where applicable. The CMP facilitates a granular level of control, enabling users to activate or deactivate specific categories of cookies through an intuitive interface.

The consent tool ensures:

- Consent records are logged and timestamped securely for auditing.
- Periodic re-consent prompts to verify continued user agreement.
- Immediate revocation of cookies upon user withdrawal of consent.

This infrastructure ensures that user autonomy is respected while maintaining transparency and auditability.

6.1 Consent Log Governance

Consent records collected via our CMP are:

- Encrypted and timestamped;
- Stored in segregated consent vaults;
- Accessible only to the DPO, CTO, and Compliance upon written request.

All log access is tracked, and usage reports are generated quarterly to detect anomalies or unauthorized access.

- Consent Log Details:

Each consent or withdrawal record includes userID (if authenticated), sessionID, device fingerprint, IP address, user-agent string, and timestamp.

Logs are WORM-protected and retained for 8 years.

6.2 CMP Vendor Due Diligence

Our CMP provider is vetted via a documented Vendor Risk Assessment (VRA) that includes:

- GDPR / PDPL compliance verification;
- SOC2 or ISO/IEC 27001 certification check;
- Resilience testing and downtime SLA reviews;
- Annual security penetration testing reports.

Vendors are re-evaluated on annual basis

- Cookie-Script Supply-Chain Review:



Prior to deployment, all third-party cookie scripts undergo NPM-audit and SRI integrity checks. Any library without a valid integrity hash or with unresolved CVEs older than 60 days is blocked from production.

- Third-Party Script Hardening:

All cookie-related JavaScript (analytics/ad pixels) must pass supply-chain security scans (SRI hashes, SAST, OSS-CVE checks) in CI/CD. Any script failing integrity or vulnerability tests is quarantined and cannot be deployed.

6.3 Granular Cookie Control

Our CMP enables users to:

- Accept or decline individual cookie categories (analytics, advertising, personalization);
- View expanded explanations for each cookie purpose;
- Update settings at any time through the footer-accessible consent center.

7. RETENTION OF COOKIE DATA

We retain cookie data only for the period necessary to fulfill the purposes for which they were collected, or as required under applicable laws. The duration depends on the type of cookie:

- Session cookies expire immediately after the session ends.
- Persistent cookies remain for a period not exceeding *[insert duration]*, unless manually deleted by the user.

Retention of Cookie Data

Where cookie-related data qualifies as personal data under PDPL, it is either:

- Hosted on UAE-based or VARA-approved data centers;
- Retained in compliance with approved cross-border transfer mechanisms and vendor DPAs;
- Processed in line with CFI's Data Localization Strategy and Audit Trail Framework.

8. CROSS-BROWSER AND CROSS-DEVICE CONSENT SYNCHRONIZATION

Where applicable and technically feasible, CFI synchronizes user cookie preferences across devices and browsers for authenticated users. By doing so, we minimize redundant consent requests and offer a seamless user experience across multiple platforms.

This synchronization is conducted using encrypted identifiers and is not used to track users across unrelated services or for profiling purposes. It strictly serves to uphold your chosen privacy settings in a consistent manner, enhancing usability while safeguarding your rights.

- Cross-Domain Consent Sync:

For logged-in users, consent settings are stored server-side under a unique userID. On any CFIX subdomain or mobile app, the CMP fetches this preference via a secure API and applies it automatically.

9. ACCESSIBILITY AND USER INCLUSION

In line with CFIX's broader commitment to digital inclusivity, the cookie consent banner and management settings are optimized for accessibility. Users with disabilities, including those using screen readers or alternative input devices, are able to interact with the consent interface without hindrance.

This is in alignment with international standards such as the Web Content Accessibility Guidelines (WCAG), ensuring that all users—regardless of ability—have equal control over their privacy preferences.

- Cookie DPIA:

CFIX will perform a dedicated DPIA for all Performance, Analytics, and Targeting cookies, assessing profiling impact, consent sufficiency, and automated decision-making risks. Reports and mitigation plans are reviewed by the Data Protection Steering Committee bi-annually.

10. CONTINUOUS MONITORING AND GOVERNANCE

CFIX's Data Protection Officer (DPO), in collaboration with our Cybersecurity and Legal Compliance teams, conducts ongoing monitoring of our cookie infrastructure. We periodically review:

- Changes in data protection laws and regulatory frameworks.
- Updates to third-party cookies and tracking technologies.
- Effectiveness of user consent mechanisms.

We ensure that no unnecessary or expired cookies remain in use, and that all practices align with the principles of lawfulness, fairness, and transparency.

- Privacy KPI Dashboard:

CFIX tracks monthly metrics

—DSAR SLA attainment (>95%), breach response time (<72 h),

—DPIA closure rate (>90% within 30 d)

—against approved privacy-risk appetite thresholds.

Exceptions auto-escalate to the Steering Committee for action.

- Consent-KPI Monitoring:

CFIX tracks daily metrics

—banner view rate, acceptance rate, opt-out rate, and forced re-consent occurrences. Monthly KPI dashboards are presented to the Compliance Committee; any metric outside defined thresholds (e.g., <80% acceptance) auto-triggers a remediation plan.

10.1 Cookie Audit Plan: Annual Cookie Audit & Technology Review

CFIX performs a full cookie technology audit at least once per year, which includes:

- Review of active cookie libraries and scripts;

- Evaluation of non-performing consent flows;
- Testing of all “opt-out” and “revoke consent” links;
- Security verification of third-party cookie scripts and trackers.

The DPO certifies the results in the annual Data Protection Report.

Cookie-Practice Audit:

Annually engage a VARA-approved auditor to test cookie-banner behavior, consent enforcement, log integrity, and third-party script compliance. Audit findings and remediation timelines are reported to the Board and VARA within 30 days of issuance.

11. MANAGING COOKIES, RELATED TECHNOLOGIES, AND ADVERTISING TRACKING

A. *User Consent and Control:*

CFIX does not deploy any non-essential cookies without your express consent. When you first access our website (www.cfix.xom), a cookie consent banner will appear, allowing you to manage your preferences. These choices are stored and respected for future visits. You can update or withdraw consent at any time by clicking the “Cookie Settings” link available in the footer.

CFIX’s cookie consent mechanism is built using a compliant cookie banner that loads immediately upon a user’s first visit. The banner:

- Classifies cookies by category
- Allows users to Accept All / Reject All / Manage Preferences
- Logs consent decisions in encrypted records, retained for 8 years
- Ensures that no non-essential cookies are deployed before consent is provided

B. *Browser Settings:*

Most modern web browsers allow you to control cookie behavior. You can usually find these settings in the “Options” or “Preferences” section. For additional help, refer to the official documentation below:

- [Internet Explorer](#)
- [Firefox](#)

- [Chrome](#)
- [Safari](#)

C. Advertising Cookies Opt-Out:

If you wish to manage or disable third-party advertising cookies, you may do so through:

- [Your Online Choices](#)
- [Digital Advertising Alliance](#)

D. Do Not Track (DNT) Signals:

Some browsers support DNT signals, but as there is currently no standard industry protocol for responding to these signals, our Sites do not process or respond to DNT requests. Where CFI relies on legitimate interest for data processing, such use is subject to rigorous assessments to ensure your rights and freedoms are not adversely impacted, in line with the UAE Data Protection Law.

E. Flash Cookies:

If you prefer to block Flash Cookies, you can modify your Flash Player settings by visiting:

- [Flash Settings Panel](#) Note that restricting Flash Cookies may impact the functionality of certain features or services on our Site.

F. Custom Cookie Preferences:

Cookies may be used to help recognize your preferences, enable core site functionality, and improve site security. These typically do not personally identify you. However, some cookies may affect your site experience if disabled. You may decline these at your discretion, except for cookies that are essential for site functionality.

G. Cookie-Vendor Alerting:

If any cookie vendor modifies its data-use policy or experiences a breach, CFI must (i) assess impact within 24h, (ii) notify VARA within 48h if material to personal data protection, and (iii) update the Cookie Register and re-obtain consent if purposes change.

12. MANAGING COOKIES, RELATED TECHNOLOGIES, AND ADVERTISING TRACKING

CFIX is committed to ensuring transparency, user autonomy, and compliance with applicable data protection regulations. We provide robust tools and clear choices to manage how cookies and related technologies are deployed on your device.

A. User Consent and Control

CFIX does **not activate any non-essential cookies** without first obtaining your **explicit and informed consent**.

- Upon your **first visit** to our website [cfix.com](#) a **cookie consent banner** will be displayed, allowing you to:

- Accept All / Reject All / Manage Cookie Preferences
- View cookie categories with clear descriptions
- Your consent preferences are securely logged and encrypted, and retained for a period of **eight (8) years** in accordance with applicable legal obligations and recordkeeping standards.
- You may **review or amend your cookie choices at any time** by clicking on the “Cookie Settings” link available in the website footer.

Our consent mechanism complies with applicable UAE Data Protection Law, GDPR (where applicable), and recognized industry standards, ensuring **non-essential cookies are never deployed prior to obtaining valid consent**.

B. Browser Settings and Controls

Most internet browsers allow users to manage cookie settings directly through their browser interfaces. Depending on your browser, you may block or delete cookies through options typically found under “Settings,” “Preferences,” or “Privacy.”

To assist, refer to the official browser guidance:

- [Internet Explorer Support](#)
- [Mozilla Firefox Support](#)
- [Google Chrome Help](#)
- [Apple Safari Support](#)

Please note that disabling cookies through your browser may affect some functionalities of our Platform.

C. Advertising Cookies and Opt-Out Mechanisms

To manage or opt out of third-party advertising cookies that track browsing behavior across websites for marketing purposes, you may use the following platforms:

- [Your Online Choices \(EU\)](#)
- [Digital Advertising Alliance \(US\)](#)

These tools allow you to exercise greater control over behavioral advertising across multiple service providers.

D. Do Not Track (DNT) Signals

While some browsers support “Do Not Track” (DNT) settings, there is currently **no standardized industry protocol** requiring companies to respond to such signals. Accordingly, CFI’s Platform does **not respond to DNT requests at this time**.

However, where we rely on **legitimate interest** as a lawful basis for processing, such processing is subject to a **Data Protection Impact Assessment (DPIA)** to ensure your rights and freedoms are fully respected in line with the UAE Federal Decree-Law No. 45 of 2021 on Personal Data Protection.

E. Flash Cookies

Some website content may use Adobe Flash to deliver features such as video playback or interactive tools. Flash Cookies (also known as Local Shared Objects) are not managed through standard browser settings.

To manage Flash Cookies, visit the [Adobe Flash Settings Panel](#).

Please note that blocking or deleting Flash Cookies may impair the availability or functionality of certain content on our Site.

F. Custom Cookie Preferences

CFIX uses cookies to enable secure authentication, store language and display settings, and provide a consistent user experience. These cookies typically do not identify you personally and are classified as **functional or essential**.

- You have the right to **decline non-essential cookies**.
- **Essential cookies**, which are necessary for security, transaction execution, and platform operability, **cannot be disabled** via the cookie preference tool or browser settings.

13. UPDATES TO THIS COOKIE POLICY

We may update this Cookie Policy from time to time to reflect changes in law, technology, or our operational practices. When updated, the “Last Updated” date at the top of this document will be revised.

We encourage users to periodically review this Policy to stay informed about our use of cookies and related technologies.

Re-Consent Trigger:

Where this Policy is updated in a way that impacts cookie categories, vendors, or purposes, CFIX will force a re-consent banner on all returning users. No non-essential cookies may fire until fresh, explicit consent is captured.

- Cookie-Consent Training:

All web-development, marketing and UX teams complete annual training on PDPL/VARA cookie consent requirements, dark-pattern avoidance, and accessibility standards (WCAG). Completion status is tracked by HR and reviewed by the DPO.

14. USER RIGHTS & DATA ACCESS

User Rights Under UAE PDPL

Users may exercise the following rights concerning data collected via cookies:

- Access what cookie-related data is held and how it is used;
- Request deletion of cookie logs and anonymized behavioral records;
- Withdraw consent at any time without affecting prior legality.

Requests can be made through our DSAR Portal or by contacting the DPO (see Section 14).

ANNEX A-VENDOR TRANSPARENCY ANNEX

Cookie Vendors & Technologies Used

- CFI X engages the following third-party service providers for cookie-related functionality:
- Google Analytics – Analytics, Consent-based
- Meta Pixel – Ad Targeting, Consent-based
- OneTrust CMP – Consent Logging, Legitimate Interest
- Cloudflare – Security & Session Control, Legitimate Interest
- Wyden & Fireblocks Portal – Session Tokens, Functional

Each provider has executed a Data Processing Agreement (DPA), and their cookie practices are periodically reviewed for UAE and VARA compliance.

Vendor	Jurisdiction of Data Processing	Personal Data Flows	DPA Appendix
Google Analytics	USA (EU-US Privacy Shield)	Aggregated metrics	Annex A-1
Meta Pixel	Ireland → USA	Ad identifiers	Annex A-2
OneTrust CMP	UAE	Consent metadata	Annex A-3
Cloudflare	UAE	Session cookies	Annex A-4
Wyden Portal	Singapore	Auth tokens (hashed)	Annex A-5