

NectraPay Cookie Policy

Effective Date: April 1, 2026 | Version: 1.0 | TAMIMI DRAFT

Scope of This Policy

This Cookie Policy applies to the NectraPay website located at www.nectrapay.com and all associated subdomains. It applies to all visitors, registered merchants, and platform users regardless of their location. This Policy should be read in conjunction with our Privacy Policy and Terms and Conditions.

1. What Are Cookies?

Cookies are small text files placed on your device (computer, tablet, or smartphone) when you visit a website. They allow the website to recognise your device, remember your preferences, and gather information about how you interact with our Platform.

Cookies may be:

- **Session cookies** – temporary files deleted when you close your browser.
 - **Persistent cookies** – remain on your device for a defined retention period or until manually deleted.
 - **First-party cookies** – set directly by NectraPay.
 - **Third-party cookies** – set by external service providers operating on our behalf.
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2. Why We Use Cookies

NectraPay uses cookies and similar tracking technologies (including web beacons, pixels, and local storage) for the following core purposes:

- To ensure the secure and reliable operation of the Platform.
- To authenticate registered merchants and maintain session integrity.
- To detect and prevent fraud, abuse, and unauthorised access.
- To analyse Platform performance and improve the user experience.
- To comply with regulatory obligations under VARA and applicable data protection law.
- To remember your preferences and personalise your experience.

3. Categories of Cookies We Use

The table below classifies all cookies placed on this Platform by category, legal basis, and retention period.

Cookie Type	Purpose	Legal Basis	Retention	Consent Required
Strictly Necessary	Essential for platform functionality: session management, authentication tokens, CSRF protection, load balancing, security flags.	Legitimate Interest / Legal Obligation	Session or up to 24 hours	No
Functional / Preference	Remembers user preferences such as language, currency display, dashboard layout, and notification settings.	Consent	Up to 12 months	Yes
Performance / Analytics	Collects aggregated, anonymised data on page visits, navigation paths, error rates, and API response	Consent	Up to 13 months	Yes

Cookie Type	Purpose	Legal Basis	Retention	Consent Required
	times to improve Platform stability.			
Security & Fraud Prevention	Identifies suspicious behaviour patterns, bot traffic, and attempted credential stuffing. Supports KYT and transaction monitoring obligations.	Legitimate Interest / Legal Obligation	Up to 90 days	No
Marketing / Retargeting	Not currently deployed on the NectraPay Platform. If introduced in future, this Policy will be updated and explicit consent obtained prior to deployment.	N/A	N/A	Yes (if deployed)

Note: NectraPay does not use cookies for targeted advertising, cross-site tracking for commercial profiling, or the sale of user data to third parties.

4. Specific Cookies in Use

4.1 Strictly Necessary Cookies

These cookies cannot be disabled as they are required for the Platform to function. They include:

- `__session` – Server-side session identifier. Expires at end of browser session.

- `csrf_token` – Cross-site request forgery protection token. Expires at end of session.
- `auth_token` – Encrypted JWT for authenticated merchant sessions. Expires after 24 hours of inactivity.
- `lb_affinity` – Load balancer affinity cookie ensuring connection routing continuity. Expires at end of session.

4.2 Security & Fraud Prevention Cookies

- `device_fp` – Anonymous device fingerprint for anomalous login detection. Retained for 90 days.
- `risk_score` – Encoded session risk signal used by transaction monitoring. Retained for session duration.

4.3 Performance & Analytics Cookies (Consent-Gated)

With your consent, the following analytics tools may set cookies:

- `_ga`, `_ga_[ID]` – Google Analytics 4 visitor and session identifiers. Retained up to 13 months.
- `_hjSession`, `_hjSessionUser` – Heatmap and session recording (Hotjar). Retained up to 12 months.

4.4 Functional Cookies (Consent-Gated)

- `np_locale` – Stores merchant interface language preference. Retained up to 12 months.
- `np_currency_display` – Stores preferred fiat currency display setting. Retained up to 12 months.
- `np_dashboard_layout` – Stores dashboard widget configuration. Retained up to 12 months.

5. Third-Party Cookies and Service Providers

NectraPay engages the following third-party processors who may set cookies or use similar tracking technologies when you use our Platform. Each provider operates under its own privacy policy, linked below.

Provider	Service	Purpose	Opt-Out / Privacy Policy
Google LLC	Analytics (GA4)	Aggregate traffic and behavioural analytics to improve platform performance. Data anonymised before processing.	google.com/safety/privacy
Hotjar Ltd	Session Heatmaps	Visual heatmaps and session recordings for UX improvement. PII masking enabled; no payment data captured.	hotjar.com/legal/privacy
Cloudflare Inc.	CDN & Security	DDoS protection, bot mitigation, and TLS termination. Security cookies are strictly necessary.	cloudflare.com/privacypolicy
Intercom Inc.	Support Chat	In-platform support widget. Only activated for authenticated merchants; no cross-site tracking.	intercom.com/legal/privacy

NectraPay conducts Data Processing Agreements (DPAs) with all third-party processors. These agreements require processors to handle data

in compliance with applicable law and restrict onward transfer of user data.

6. Jurisdictional Compliance Framework

NectraPay serves merchants globally. Our cookie practices are calibrated to meet the highest applicable standard across the jurisdictions in which we operate.

Jurisdiction	Applicable Law	Consent Standard	NectraPay Approach
UAE	PDPL (Federal Decree-Law No. 45/2021); VARA Data Governance Standards	Consent for non-essential processing; legitimate interest permissible for security and compliance	Consent banner served; VARA-aligned data minimisation applied to all cookie data
European Union / EEA	GDPR (Regulation 2016/679); ePrivacy Directive	Opt-in consent required for all non-essential cookies prior to placement	Consent Management Platform (CMP) deployed; cookies blocked until affirmative consent recorded
Canada	PIPEDA; Law 25 (Quebec)	Express consent for analytics and functional cookies; implied consent for strictly necessary	Consent banner served at first visit; Quebec-specific disclosure included for Law 25
United Kingdom	UK GDPR; PECR	Opt-in consent required for non-essential cookies; legitimate interest for security	UK-specific consent banner variant; ICO guidance followed

Jurisdiction	Applicable Law	Consent Standard	NectraPay Approach
Other Jurisdictions	Applicable local law	GDPR-standard applied as default baseline where local law is less prescriptive	GDPR-equivalent consent flows served globally as the default standard

VARA Compliance Note

As a VARA-regulated entity, NectraPay is required to maintain records of all data processing activities, including cookie-based data collection. Cookie data that constitutes personal data is processed in accordance with VARA's data governance standards and the UAE Personal Data Protection Law (PDPL). Merchants may request a copy of our Data Processing Register by contacting compliance@nectrapay.com.

7. Consent Management

7.1 How We Collect Consent

On your first visit to www.nectrapay.com, a cookie consent banner will be presented. This banner:

- Clearly describes each category of cookie and its purpose.
- Requires a separate, granular consent action for each non-essential category – pre-ticked boxes are not used.
- Does not deploy non-essential cookies prior to receiving your consent.
- Records a timestamped log of your consent preference, linked to your session.

7.2 Withdrawing Consent

You may withdraw or modify your cookie preferences at any time without detriment to your use of the Platform. To update your preferences:

- Click the "Cookie Settings" link in the footer of any page on

www.nectrapay.com.

- Use the consent management panel to toggle categories on or off.
- Withdrawing consent will cause non-essential cookies to be deleted from your device within 30 seconds of confirmation.

7.3 Consent Records

NectraPay retains records of consent for a period of 3 years in line with XXX record-keeping requirements. These records include: date and time of consent, categories accepted or rejected, and the version of this Cookie Policy in force at the time of consent.

8. Browser and Device-Level Cookie Controls

In addition to our on-site consent management tool, you may control cookie behaviour directly through your browser settings. Please note that disabling strictly necessary cookies will impair or prevent your access to the NectraPay Platform.

Browser	Cookie Settings Path	Support Link
Google Chrome	Settings → Privacy and Security → Cookies and other site data	support.google.com/chrome/answer/95647
Mozilla Firefox	Settings → Privacy & Security → Cookies and Site Data	support.mozilla.org/kb/enhanced-tracking-protection
Apple Safari	Preferences → Privacy → Manage Website Data	support.apple.com/guide/safari
Microsoft Edge	Settings → Cookies and site permissions →	support.microsoft.com/microsoft-edge/cookies

Browser	Cookie Settings Path	Support Link
	Cookies and site data	
Opera	Settings → Advanced → Privacy & security → Site Settings → Cookies	help.opera.com/en/latest/security-and-privacy

You may also opt out of Google Analytics measurement across all websites using the Google Analytics Opt-out Browser Add-on, available at tools.google.com/dlpage/gaoptout.

9. Data Retention and Deletion

Cookie-derived data is retained only for the period necessary for its stated purpose. Upon expiry of the retention period, data is automatically deleted or anonymised. The maximum retention periods are:

- **Strictly necessary cookies:** Session duration or 24 hours.
- **Security and fraud prevention:** Up to 90 days.
- **Analytics and performance:** Up to 13 months.
- **Functional and preference:** Up to 12 months.
- **Consent records:** 3 years (regulatory requirement).

You may request deletion of cookie-derived personal data by submitting a Data Subject Access Request (DSAR) or Erasure Request to: privacy@nectrapay.com. Requests will be processed within 30 days in accordance with applicable law.

10. Do Not Track Signals

Some browsers transmit Do Not Track (DNT) signals to websites. NectraPay acknowledges these signals. Where a DNT signal is detected, only strictly necessary and security cookies will be deployed.

Analytics and functional cookies will not be placed without explicit opt-in consent, regardless of DNT signal status, as consent is obtained separately through our Consent Management Platform.

11. Updates to This Cookie Policy

NectraPay reserves the right to update this Cookie Policy at any time to reflect changes in technology, legal requirements, or our service offering. When material changes are made:

- The "Effective Date" at the top of this document will be updated.
- A prominent notice will be displayed on the Platform for a minimum of 30 days.
- Where required by law, fresh consent will be sought for any new categories of cookie introduced.
- Registered merchants will be notified by email to their registered address.

We encourage you to review this Policy periodically. The current version will always be accessible at www.nectrapay.co/legal/cookies.

12. Your Data Subject Rights

Depending on your jurisdiction of residence, you may hold the following rights in relation to personal data collected via cookies:

- **Right of Access** – request confirmation of whether cookie data is processed and receive a copy.
- **Right to Rectification** – request correction of inaccurate cookie-derived data.
- **Right to Erasure** – request deletion of your personal data where there is no legal basis to retain it.
- **Right to Restriction** – request that we temporarily suspend processing of your data.
- **Right to Portability** – receive your personal data in a structured, machine-readable format.
- **Right to Object** – object to processing based on legitimate interest.

- **Right to Withdraw Consent** – withdraw consent for non-essential cookies at any time.
- **Right to Lodge a Complaint** – with the relevant supervisory authority in your jurisdiction.

To exercise any of these rights, please contact our Data Protection Officer at: privacy@nectrapay.com. We will respond within the legally required timeframe applicable to your jurisdiction (up to 30 days for most jurisdictions).

13. Contact Information

For questions, complaints, or requests relating to this Cookie Policy or our data processing practices, please contact:

Data Protection Officer

privacy@nectrapay.com

www.nectrapay.co/legal/cookies

Compliance Team

compliance@nectrapay.com

VARA Regulatory Queries

NectraPay operates under the Virtual Assets Regulatory Authority (VARA) of the United Arab Emirates.

This Cookie Policy is subject to the laws of the applicable jurisdiction and the XXX regulatory framework.

Last reviewed: April 2026

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