



FLUSSO DYNAMICS GROUP SP. Z O.O.

COOKIE POLICY

Version 1.1 — March 2026
<https://flussogroup.com/cookies>

COOKIE POLICY

This Cookie Policy is an integral part of the Legal Notice, Terms and Conditions, and Privacy Policy of the website <https://flussogroup.com/> (hereinafter, the “Website”), owned and operated by:

Detail	Information
Legal Entity	FLUSSO DYNAMICS GROUP SP. Z O.O.
Registered Office	ul. Hoża 86, lok. 210, 00-682 Warsaw, Poland
Tax ID (NIP)	7011205258
National Court Register (KRS)	0001105723
Privacy Contact	compliance@flussogroup.com

Accessing and browsing the Website, as well as the acceptance of the cookie banner and its configuration, imply the acceptance of the terms and conditions set forth in this Cookie Policy.

Flusso is responsible for the cookies used on the Website and the processing of data obtained through them, deciding on the purpose, content, and use of the information collected. The Website does not install non-essential cookies on Users’ devices until they have expressly accepted their installation.

1. WHAT IS A COOKIE?

Cookies are small text files containing data that are downloaded to the user’s device when visiting a website or application. They are associated with an anonymous user and their device, and in some cases may allow access to personal data.

Cookies are essential for the proper operation of web services. Their main purpose is to recognize the user each time they access the Website, enabling improved quality of service, customized user experience, and the provision of information that may be relevant to the user.

Users can access their browser settings to modify and/or block the installation of cookies, without this preventing access to the Website content, although some features may not work optimally.

2. TYPES OF COOKIES

2.1. By Ownership

- First-party cookies: sent and managed directly by Flusso from the Website.
- Third-party cookies: sent and managed by entities other than Flusso (e.g., analytics providers).

2.2. By Duration

- Session cookies: remain active only during navigation and are deleted when the user leaves the Website.
- Persistent cookies: remain stored on the device for a defined period and can be accessed each time the user visits the Website.

2.3. By Purpose

- Necessary cookies: essential for navigation, session management, security, and payment processing. Cannot be disabled.
- Functional cookies: enable user preferences such as language selection and display settings.

- Analytical cookies: used to analyze user navigation and measure Platform usage. Installed only with explicit consent.
- Marketing cookies: used for personalized communications and advertising. Installed only with explicit consent.

3. COOKIES USED ON THE WEBSITE

3.1. Necessary Cookies (Always Active)

These cookies are essential for the Website to function correctly. Without them, core functionalities such as login, session management, and payment security would be disabled.

Cookie	Owner	Purpose	Type	Expiry
flusso_session	Flusso	Identify and maintain the user's session during navigation	First-party	Session
XSRF-TOKEN	Flusso	CSRF protection – prevent cross-site request forgery attacks	First-party	Session
cookie_consent	Flusso	Store the user's cookie preferences and consent choices	First-party	1 year

Technical characteristics: session cookies are configured as HTTP-only with SameSite=Lax attribute for enhanced security.

3.2. Functional Cookies (Active by Default)

These cookies store user preferences to improve the browsing experience.

Cookie	Owner	Purpose	Type	Expiry
lang	Flusso	Store the user's language preference	First-party	1 year

3.3. Analytical Cookies (Disabled by Default)

These cookies are used to analyze user navigation on the Website and measure Platform performance. They are only installed after the user has given explicit consent through the cookie configuration panel.

Cookie	Owner	Purpose	Type	Expiry
_ga	Google Inc.	Distinguish unique users by assigning a randomly generated identifier	Third-party	2 years
ga[ID]	Google Inc.	Store information about user sessions and interactions	Third-party	2 years

Important: Google Analytics cookies involve the transfer of data to Google servers, which may be located outside the European Economic Area (EEA). Where such transfers occur, Flusso ensures appropriate safeguards are in place (Standard Contractual Clauses or adequacy decisions) in accordance with Chapter V of the GDPR. Users who do not consent to analytical cookies will not have their data transferred to Google.

3.4. Marketing / Behavioral Advertising Cookies

Flusso does not currently use marketing or behavioral advertising cookies on the Website.

4. COOKIE CONSENT AND CONFIGURATION

4.1. Consent Mechanism

In compliance with Regulation (EU) 2016/679 (GDPR), the Polish Telecommunications Law, and Spanish Law 34/2002 (LSSI-CE), the Website implements a cookie consent banner that:

- Appears visibly on the user’s screen upon first visit and remains accessible at all times.
- Identifies the data controller (Flusso Dynamics Group Sp. z o.o.).
- Describes the categories and purposes of cookies used.
- Provides an “Accept All” button for express consent.
- Provides a “Configure” or “Reject” option for granular cookie selection.
- Links to the full text of this Cookie Policy for detailed information.

Non-essential cookies (analytical, marketing) are not installed until the user has provided explicit consent by clicking “Accept All” or by enabling specific categories in the configuration panel. Mere scrolling or continued navigation does not constitute valid consent.

4.2. Configuration Panel

The configuration panel allows users to accept or reject cookies by category:

Category	Default Status	User Control
Necessary	Active (mandatory)	Cannot be disabled – essential for Website operation
Functional	Active	Can be disabled by the user
Analytics	Disabled	Requires explicit opt-in consent
Marketing	Disabled	Requires explicit opt-in consent

If the user saves their preferences without selecting any optional category, this shall be equivalent to rejecting all non-essential cookies. Users may modify their preferences at any time by accessing the cookie configuration panel available on the Website.

4.3. Browser Settings

In addition to the Website’s cookie configuration panel, users may configure their browser to manage or block cookies. Below are links to the cookie management guides of the most common browsers:

Browser	Settings Guide
Google Chrome	https://support.google.com/chrome/answer/95647
Mozilla Firefox	https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer
Microsoft Edge	https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09
Safari	https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac
Opera	https://help.opera.com/en/latest/web-preferences/#cookies

For mobile browsers:

- Chrome Mobile: Settings > Privacy > Cookies
- Safari iOS: Settings > Safari > Privacy & Security

- Firefox Mobile: Settings > Privacy > Cookies

5. YOUR DATA PROTECTION RIGHTS

For full information regarding: (i) purposes and legal bases of processing; (ii) recipients of personal data; (iii) international transfers; (iv) retention periods; (v) data subject rights (access, rectification, erasure, restriction, portability, objection); and (vi) the existence of automated decisions, please consult Flusso's Privacy Policy, available at <https://flussogroup.com/privacy>.

To exercise any of your data protection rights, contact compliance@flussogroup.com.

The competent supervisory authorities are:

- Poland: President of the Office for Personal Data Protection (UODO) – <https://uodo.gov.pl/>
- Spain: Spanish Data Protection Agency (AEPD) – <https://www.aepd.es/>

6. MODIFICATIONS TO THIS COOKIE POLICY

This Cookie Policy may be updated due to legislative or regulatory changes, changes in the cookies used on the Website, or to adapt to guidance issued by the competent data protection authorities (UODO in Poland and/or AEPD in Spain).

Users are advised to review this Cookie Policy periodically. When significant changes occur, they will be communicated to Users via the Website and, where appropriate, via email.

Last updated: March 2026

© 2026 Flusso Dynamics Group Sp. z o.o. — All rights reserved.
VASP Registration RDWW-1317 | Warsaw, Poland | compliance@flussogroup.com