



COOKIE POLICY

Use of Cookies and Tracking Technologies



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1. Introduction

This Cookie Policy explains how CruisePay Finance Ltd (“CruisePay,” “we,” “our,” or “us”) uses cookies and similar tracking technologies on our website and platform (collectively, the “Site”). This Policy should be read in conjunction with our Privacy Policy.

By using our Site, you consent to the use of cookies in accordance with this Policy. You can manage your cookie preferences as described in Section 6 below.

2. What Are Cookies?

Cookies are small text files that are placed on your device (computer, tablet, or mobile phone) when you visit a website. They are widely used to make websites work efficiently, improve user experience, and provide information to the site operators. Cookies can be “persistent” (remaining on your device until they expire or you delete them) or “session” (deleted when you close your browser).

In addition to cookies, we may use similar technologies such as web beacons (pixel tags), local storage, and device fingerprinting for the purposes described in this Policy.

3. Types of Cookies We Use

3.1 Strictly Necessary Cookies

These cookies are essential for the operation of our Site and Services. They enable core functionality such as secure login, session management, fraud prevention, and compliance with security requirements. These cookies cannot be disabled without impairing the functionality of our platform.

Cookie Name	Purpose	Duration	Type
session_id	Maintains your authenticated session and ensures secure access to your Account.	Session (deleted when browser closes)	First-party
csrf_token	Protects against cross-site request forgery attacks when submitting forms or transactions.	Session	First-party
device_trust	Recognizes trusted devices for multi-factor authentication and fraud prevention.	90 days	First-party
consent_prefs	Stores your cookie consent preferences.	12 months	First-party

3.2 Functional Cookies

These cookies enable enhanced functionality and personalization, such as remembering your language preference, display settings, and recently used features. They may be set by us or by third-party providers whose services we use.

Cookie Name	Purpose	Duration	Type
lang_pref	Remembers your preferred language for the platform interface.	12 months	First-party
display_settings	Stores display preferences such as currency format and timezone.	12 months	First-party
recent_beneficiaries	Caches recently used beneficiary details for faster transaction entry.	Session	First-party

3.3 Analytics and Performance Cookies

These cookies collect information about how visitors use our Site, including which pages are visited most frequently, how long visitors spend on pages, and any error messages encountered. This information is used to improve the performance and usability of our Site. All data collected is aggregated and anonymized.

Cookie Name	Purpose	Duration	Type
_ga / _gid	Google Analytics — distinguishes unique users, tracks site usage patterns and page views.	_ga: 2 years; _gid: 24 hours	Third-party
_gat	Google Analytics — throttles request rate to manage data collection volume.	1 minute	Third-party
perf_metrics	Collects anonymous performance data (page load times, error rates) for platform optimization.	30 days	First-party

3.4 Marketing and Advertising Cookies

CruisePay does not currently use marketing or advertising cookies. If this changes in the future, this Policy will be updated and your consent will be requested before any marketing cookies are placed.

4. Third-Party Cookies

Some cookies on our Site are placed by third-party service providers. These third parties have their own privacy and cookie policies that govern the use of data collected through their cookies. CruisePay does not control these third-party cookies. The third-party services we currently use include:

- Google Analytics (analytics and performance measurement).
- Identity verification service providers (fraud prevention, as part of strictly necessary cookies).

We review our third-party cookie usage regularly and update this Policy accordingly.

5. Cookies and Compliance Obligations

Certain cookies used on our Site are necessary to comply with our legal obligations under the PCMLTFA, including session management for secure authentication, device recognition for fraud prevention, and security cookies that support our AML/CTF monitoring. These cookies cannot be disabled, as doing so would prevent us from meeting our regulatory requirements.

6. Managing Your Cookie Preferences

6.1 Cookie Consent Banner

When you first visit our Site, you will be presented with a cookie consent banner that allows you to accept or decline non-essential cookies. Strictly necessary cookies are always active and cannot be declined.

6.2 Browser Settings

Most web browsers allow you to control cookies through their settings. You can typically: view the cookies stored on your device; delete individual cookies or all cookies; block cookies from specific or all sites; and set your browser to notify you when a cookie is placed. Please note that disabling cookies may affect the functionality of our Site and your ability to use certain features.

6.3 Opt-Out Links

You can opt out of Google Analytics tracking by installing the Google Analytics Opt-Out Browser Add-on, available at: <https://tools.google.com/dlpage/gaoptout>.

7. Do Not Track Signals

Our Site does not currently respond to “Do Not Track” (DNT) browser signals. This is because there is no industry-standard interpretation of DNT signals for financial services platforms. We will review this position if a standard is established.

8. Data Retention for Cookies

Cookie data is retained for the periods specified in the tables above. Session cookies are deleted when you close your browser. Persistent cookies remain on your device until they expire or you delete them manually. Analytics data derived from cookies is retained in aggregated, anonymized form for up to 26 months.

9. International Data Transfers

Some cookie data may be processed outside Canada, including by Google LLC (United States) for analytics purposes. Where such transfers occur, appropriate safeguards are in place as described in our Privacy Policy.

10. Changes to This Cookie Policy

We may update this Cookie Policy from time to time. Changes will be posted on our Site with an updated effective date. If we introduce new categories of cookies (such as marketing cookies), we will request your consent before placing them.

11. Contact Information

If you have questions about this Cookie Policy, please contact:

Privacy Officer, CruisePay Finance Ltd

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Email: privacy@cruisePay.com