



COOKIE AND SIMILAR TECHNOLOGIES POLICY

PACTIM

Effective Date: 19 Augustus 2026

OVERVIEW

Operator: ESR PARADISE HOLDING LTD.

Website: www.pactim.com

1. PURPOSE

This Cookie and Similar Technologies Policy explains how **ESR PARADISE HOLDING LTD.** (“PACTIM”, “we”, “us” or “our”) uses cookies and similar technologies when you access or use the PACTIM website, mobile application and related services (collectively, the “**Platform**”).

These technologies may be used to enable and secure essential Platform functionality, remember User preferences, understand how the Platform is used, monitor performance, improve the User experience, support analytics and, where permitted by applicable law, deliver, personalise and measure advertising.

This Policy explains the types of cookies and similar technologies that may be used, the purposes for which they are used, the circumstances in which information collected through them may be processed or shared, and the choices and controls available to Users.

This Policy should be read together with the **PACTIM Privacy Policy** and **Terms and Conditions**. Where applicable law requires consent for the use of a particular cookie or similar technology, PACTIM will obtain such consent through an appropriate consent mechanism before activating the relevant technology.

2. CATEGORIES

PACTIM may use the following categories of cookies and similar technologies, depending on the functionality made available through the Platform and the User's preferences:

2.1 Strictly Necessary Technologies

These technologies are necessary for the operation, security and basic functionality of the Platform. They may be used for purposes including user authentication, account and session management, security, fraud prevention, load balancing and maintaining the functionality of the Platform. These technologies cannot ordinarily be disabled where they are necessary to provide a service requested by the User.

2.2 Preference and Functionality Technologies

These technologies allow the Platform to remember information and preferences provided by a User, such as language, settings and other configuration choices, in order to provide a more consistent and personalised experience.

2.3 Analytics and Performance Technologies

These technologies may be used to collect information about how Users interact with the Platform, including information concerning visits, pages or features accessed, engagement, performance and errors. PACTIM may use this information to understand Platform usage, monitor performance and improve its functionality.

2.4 Advertising and Personalisation Technologies

These technologies may be used to measure advertising performance, understand User interests and interactions, and, where permitted by applicable law, deliver or personalise advertising and promotional content. Where consent is required, these technologies will only be activated following the User's consent.

2.5 Third Party Technologies

PACTIM may permit third party service providers to use cookies or similar technologies in connection with services such as analytics, advertising, security, authentication,

communications or other Platform functionality. The use of such technologies may be governed by the relevant third party's own privacy policy and terms, in addition to the requirements applicable to PACTIM.

PACTIM may update or amend the technologies used on the Platform from time to time as its functionality, service providers or business requirements change.

3. CONSENT

Where applicable law requires consent for the use of cookies or similar technologies, PACTIM will obtain the User's consent before activating the relevant non essential technologies.

Consent will be requested through an appropriate cookie consent mechanism and will be **separate from acceptance of the Terms and Conditions or Privacy Policy**. Users will be provided with sufficient information to understand the categories and purposes of the technologies for which consent is requested.

Users will be able to accept or reject non essential categories of cookies and similar technologies and, where supported by the Platform, select their preferences on a category by category basis.

PACTIM will not rely on continued browsing or use of the Platform as consent where applicable law requires an affirmative consent mechanism. Consent will not be pre-selected where applicable law requires an active choice.

Where consent is provided, Users may **withdraw or change their consent at any time** through the cookie preference controls made available by PACTIM. Withdrawal of consent will not affect the lawfulness of processing carried out before the withdrawal.

Where a User declines or withdraws consent for non essential technologies, the User will continue to be able to access the Platform, although certain non essential functionality, personalisation or advertising features may be affected.

PACTIM will maintain appropriate records of consent where required, including the relevant consent choice and the version of the information presented to the User.

Where a cookie or similar technology is strictly necessary for a service or functionality expressly requested by the User, PACTIM may use that technology without obtaining consent where permitted by applicable law.

4. COOKIE PREFERENCES

PACTIM will provide Users with appropriate controls to manage their preferences in respect of non essential cookies and similar technologies where required by applicable law.

Users may accept or reject non essential categories of cookies and similar technologies through the cookie preference mechanism made available on the Platform. Where technically and legally appropriate, Users may also manage their preferences separately for different categories, including analytics, functionality and advertising technologies.

Users may **change or withdraw their preferences at any time** through the cookie settings or other privacy controls made available by PACTIM. A change or withdrawal of preferences will apply to future use of the relevant technologies and will not affect the lawfulness of any processing undertaken before the change or withdrawal.

Where a User rejects or withdraws consent for non essential technologies, PACTIM will not subsequently activate those technologies unless and until the User provides the required consent again, subject to any applicable technical limitations.

Strictly necessary technologies may continue to operate where they are required to provide the Platform or a service expressly requested by the User, or where their use is otherwise permitted without consent under applicable law.

PACTIM may retain information concerning a User's cookie preferences and consent choices where reasonably necessary to **record and demonstrate compliance with applicable law** and to ensure that the User's preferences are respected.

Users should note that disabling or rejecting certain technologies may affect the availability or functionality of particular features of the Platform.

5. MOBILE APPLICATION TECHNOLOGIES

The PACTIM mobile application may use technologies such as **software development kits (SDKs), device identifiers, local storage, application identifiers, pixels and other similar technologies** to enable and support the functionality, security and performance of the application.

These technologies may be used for purposes including authentication, account and session management, security, fraud prevention, crash reporting, diagnostics, analytics, notifications, performance monitoring and the delivery and improvement of application functionality.

Certain technologies may collect information relating to the User's device, operating system, application version, IP address, application activity, interactions with the Platform and other technical or usage information. The types of information collected and the purposes for which it is used are described in the **PACTIM Privacy Policy**.

Where a mobile application technology involves the collection or processing of personal information, tracking or other activity for which consent is required under applicable law, PACTIM will obtain the required consent or provide the applicable opt out mechanism before activating that technology.

Users may also control certain permissions, including **location, notifications, camera, microphone and other device permissions**, through the settings of their mobile device. Restricting such permissions may affect the availability or functionality of certain Platform features.

PACTIM may use third party SDKs and other technologies provided by third party service providers. Such providers may process information in accordance with their applicable contractual arrangements and privacy policies.

PACTIM may update, replace or introduce mobile application technologies from time to time as the Platform's functionality, security requirements or service providers change. Where such changes require additional consent or disclosure under applicable law, PACTIM will provide the appropriate notice or consent mechanism.

6. THIRD PARTY TECHNOLOGIES

PACTIM may use cookies, software development kits (SDKs), pixels, application programming interfaces (APIs), local storage, device identifiers and other similar technologies provided or operated by third party service providers in connection with the Platform.

These third party technologies may support functions including **analytics, advertising, authentication, security, communications, notifications, crash reporting, performance monitoring, fraud prevention, hosting and other Platform functionality**.

Third party providers may collect and process information through these technologies in accordance with their own privacy policies and applicable contractual arrangements with PACTIM. The use of a third party technology does not necessarily mean that the third party has unrestricted access to all information held by PACTIM.

Where third party technologies involve non essential tracking, analytics, advertising or other processing for which User consent is required, PACTIM will obtain the applicable consent before activating the relevant technology. Users may manage or withdraw their preferences in accordance with the **Cookie Preferences** section of this Policy.

PACTIM may also use third party technologies that are strictly necessary to provide a service or functionality requested by the User, or where their use is otherwise permitted without consent under applicable law.

PACTIM does not control the technologies, security practices or privacy practices of third party providers and, to the extent permitted by applicable law, is not responsible for the independent processing activities of those third parties.

The third party technologies used by PACTIM may change from time to time. PACTIM will update its cookie and technology disclosures where reasonably necessary to reflect material changes to the technologies used on the Platform.

7. CONTACT

ESR PARADISE HOLDING LTD.

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