

COOKIE POLICY

B2KAPITAL PORTFOLIO MANAGEMENT

WEBSITE

Effective Date: [the date of the publishing on the website should be included]

At **B2KAPITAL PORTFOLIO MANAGEMENT** ("we," "us," or "our"), we value your privacy and are committed to ensuring that your online experience with us is both safe and enjoyable. The Cookie Policy is designed to provide you with clear and understandable information about how we use cookies and similar technologies on our website and how they impact your browsing experience.

Please take a moment to read this policy to understand the choices you have when it comes to cookies and your data. Your privacy matters to us, and we want to empower you to make informed decisions.

About Us

B2Kapital Portfolio Management is a company with a financial profile, with a unique expertise in the management of performing and non-performing loans on the Romanian market. The company offers consultancy to clients who have overdue debts under the management of B2Kapital Portfolio Management, from their acquisition to their monitoring. The team is made up of professional people, always open to turning difficult situations into valuable opportunities for investors and clients. B2Kapital Portfolio Management is active with a presence in Romania and is part of the Norwegian Group B2 Impact ASA, provider of debt management solutions..

Contact Us

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- **Website:** <https://b2kapital.ro>

If you have any questions, concerns, comments, or requests regarding this Cookie Policy and Privacy Policy or our data practices, please contact us at privacy@b2kapital.ro.

What Cookie Policy Covers

This Cookie Policy explains how we collect, use, disclose, and protect personal data obtained through our website, particularly concerning the use of cookies and tracking technologies.

Our Cookie Policy outlines how we use cookies and similar technologies on our website to enhance your browsing experience. For comprehensive information regarding the processing of personal data and your privacy rights as a website user, please refer to our [link to Privacy Policy](#). If you have any questions or concerns about your

personal data or privacy, the Privacy Policy provides detailed insights into how we are handling and protecting your personal data, including explanations about key legal and technical terms on data protection.

We outlined below some key points about our **Cookie Policy** to help you navigate its contents effectively:

Content:

1. What are Cookies, and How We Collect Data?
2. Why We Use Cookies, and How We Do It Legally?
3. Your Cookie Consent
4. Do Not Track Preferences
5. Managing Cookies
6. How Long Do We Keep Cookies Data?
7. Cookies We Use on Our Website
8. Cookies and Profiling
9. Who Do We Share Your Cookie Data With?
10. International Data Transfers
11. Your Rights
12. Cookie Policy Updates

1. What are Cookies, and How We Collect Data?

1.1. About Cookies

Cookies are small text files that websites place on your device as you are browsing. They are processed and stored by your web browser. In and of themselves, cookies are harmless and serve crucial functions for websites. Cookies can also generally be easily viewed and deleted.

Our website collects some Personal Data from its Users (Visitors). When you visit our website, it may store or retrieve information on your browser, mostly in the form of cookies.

This information might be about you, your preferences, or your device and is mainly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalized web experience.

Because we respect your right to privacy, you can choose not to allow some types of cookies. However, blocking some types of cookies may impact your experience of the site and the services we are able to offer.

Types of cookies based on their purpose, duration, and source.

Purpose	Strictly Necessary Cookies (Essential Cookies)	It is essential for our site to function correctly. Cookies are automatically set when you use our site and cannot be turned off. They don't store personal information.
	Preferences Cookies (Functional Cookies)	These enhance your experience by remembering your language preference, region, and login details. If disabled, some services may not work correctly.
	Performance Cookies	These help us analyze site performance and visitor behavior. Information is anonymous and aggregated. Disabling them means we can't monitor site performance.
	Statistics Cookies (Analytics)	They collect anonymous data about your site usage to improve functionality. Some are from third-party analytics services, solely for our use.
	Marketing Cookies (Advertising Cookies)	These track your online activity to deliver relevant ads. They may share data with other organizations. They are usually third-party and result in more personalized ads.

Source	First-Party Cookies	Our website puts First-party cookies on your device directly when you visit.
	Third-Party Cookies	Set by external services like advertisers or analytics tools.
Duration	Session Cookies	These cookies are temporary and expire once you close your browser (or once your session ends).
	Webpage Cookies	Stay until deleted or expire for up to 12 months.

1.2. Data Collection and Sources

When you visit and use our website, we collect certain data to enhance your experience and provide you with the right content. We collect data automatically during your visit through cookies and similar technologies, such as your IP address, browser type, device information, and website usage patterns.

Data Linkage. The data collected through cookies is not always directly linked to your identity. It is usually collected and processed in an anonymous and aggregated form to analyze website performance, user behavior, and improve our services. However, the data collected through cookies and similar technologies, may be linked to your identity when you provide personal information through forms on our website. This linkage enables us to tailor your experience, provide relevant content, and improve our services.

2. Why We Use Cookies and How We Do It Legally?

We Use Cookies and Related Technologies to:

- Monitor the technical status of our website and make our website operational.
- Store users' preferences
- Provide online services to our webpage users.
- Gather analytics data about users' behavior.
- Improve and customize the experience for our users.
- Perform marketing and advertising communication.

How Do We Collect Your Data through Cookies?

Purpose	Details on the Purpose	Legal Base	Data Processed
Ensuring Website Security	We process your personal data to protect our website's security, prevent unauthorized access, and stop fraudulent activities.	Legitimate Interest	IP addresses, device information, browser information, website usage data, clickstream data, and session info.
Cookies and Tracking Technologies	We collect data about your browsing activities, preferences, and interactions through cookies and similar technologies.	Consent (Unless strictly necessary)	IP address, device information, browser information, website usage data.
Cookie Consent Recording	We request and record your consent for non-essential cookies and manage cookie preferences to comply with legal requirements.	Legal Obligation Legitimate Interest	Recording of your consent for non-essential cookies, cookie preferences, device and browser info, IP address.
Storing Users Preferences	We use cookies and related technologies to store users' preferences.	Legitimate Interest	IP address, device information, browser information, website usage data.

Data Retention Execution	We process data to meet legal obligations, like record-keeping requirements, data retention and erasure requirements	Legal Obligation	Erasure of data collected after retention period has expired.
Website Analytics and Performance	We use data for website analysis to enhance performance and user experience.	Consent Legitimate Interest	Website usage data, clickstream data, session info, device info, browser info, anonymized data, preferences.
Research and Development	We process data to improve website features	Consent	Website usage data
Location-based Interactions	We collect geolocation data with your consent to enhance your website experience.	Consent	Geographic Position
Customizing User Experience	We personalize your website experience based on your preferences.	Consent	Website usage data, page views, clickstream data, session info, device info, browser info.
Personalized Marketing and Advertising	We collect data to deliver personalized marketing communications and targeted advertising based on your website preferences and behavior.	Consent	IP address, device information, browser information, website usage data, demographic information, visitor interactions.
Monitoring and auditing	We use cookies and related technologies to monitor the technical status of our website and ensure its operation.	Legitimate interest	IP address, device information, browser information, website usage data.
Responding to Legal Requests	We process data to respond to legal requests, such as court orders or law enforcement inquiries.	Legal Obligation	All personal data collected through cookies.

3. Your Cookie Consent

By default, the browsing experience of our website visitors is NOT tracked by our website. You may, though, choose to consent to our processing of personal data collected during your browsing experience on our website to allow us to improve your visiting experience.

If you enable the **Do Not Track option** (see below for an explanation) in your web browser, we will respect your choice and your browsing experience on our website will not be tracked.

If you have not enabled the Do Not Track option, we will show you a cookie banner for you to make your choice and install a consent cookie to keep track of your choice. If you consent to the processing of your personal data by using cookies, then our website is activated and some relevant cookies loaded (i.e., essential, and non-essential ones, as described below under section *“Cookies we use on our website”*). You can always decide to withdraw your consent or consent again at any time.

The **cookie consent expires after a maximum 12 months**. Then, if your Do Not Track option is not enabled, you will be shown the cookie banner again to renew your choice. In case you have disabled all cookies, you will be shown the cookie banner at each visit to our website.

If you don't make a choice in the banner, no cookies will be deployed (either essential or non-essential), but the banner will re-appear every time you visit our website. If you wish to consent to (or withdraw your consent from) please express your **option to manage your consent** regarding cookies.

4. Do Not Track Preferences

Do Not Track is a function that allows visitors not to be tracked by websites. Do Not Track options are available in several browsers, including:

- [Firefox](#)
- [Internet Explorer](#)
- [Chrome](#)
- [Safari](#)
- [Opera](#)

5. Managing Cookies

Removing Cookies from Your Device

You can delete all cookies that are already on your device by clearing the browsing history of your browser. This will remove all cookies from all websites you have visited. Be aware though that you may also lose some saved information (e.g., saved login details, site preferences).

Managing Site-Specific Cookies

Necessary cookies are required for providing the website service and cannot be disabled. However, you have the option to manage settings related to all other types of cookies by clicking cookie management on our webpage. For more detailed control over site-specific cookies, check the privacy and cookie settings in your preferred browser.

Blocking Cookies

You can set most modern browsers to prevent any cookies from being placed on your device, but you may then have to manually adjust some preferences every time you visit a site/page. Some services and functionalities may not work properly at all (e.g., profile logging-in).

Managing Our Cookies

You can manage your preferences concerning cookies from our website by clicking the cookie management option.

6. How Long Do We Keep Cookies Data?

Our website usually keeps cookie-collected data until you finish browsing, or up to 12 months, and automatically deletes visitors' logs after 12 months. Aggregated data sets containing no personal data may be stored for an indefinite period for analytical purposes.

7. Cookies We Use on Our Website

Based on your consent and provided preferences, we use statistical and marketing cookies from **Matomo Analytics and Google Analytics** to enhance our website functionality, analyze user behavior, and improve our services.

These cookies help us understand how our website is used and provide you with tailored content and marketing communication.

In simple terms:

- **Statistical Cookies (First Party)** come from our website directly. These cookies track your website usage and help us improve our site. Data collected includes page visits and duration, typically retained for up to 12 months.
- **Marketing Cookies (First Party)** also come from our website. These cookies understand your interests based on your site interactions, allowing us to show relevant ads. Data collected includes website interactions and is typically retained for up to 12 months.

Our trusted partners assist us in managing these cookies.

- **Matomo Analytics** is an open-source web analytics platform to collect and analyze data about our website's usage. For more information about Matomo Analytics privacy practices, please review Matomo's Privacy Policy on their website: [Privacy Policy - Analytics Platform - Matomo](#)
Matomo Analytics is provided by InnoCraft Ltd, located in New Zealand, while 100% of the data collected and backups are securely stored in Europe. Although New Zealand is outside the Europe Economic Area ("EEA"), is one of the countries that the EU considers to have an adequate level of data protection.
- **Google Analytics** and its related products is a web service provided by Google Ireland Limited ("Google") for users of Google services based in the European Economic Area. For more information about Google Analytics privacy practices, please review Google Privacy Policy on the Google website: [Privacy Policy - Privacy & Terms - Google](#).
When using Google Analytics for users located in the European Economic Area (EEA), the data collected is typically stored within the European Union (EU) or the European Economic Area. By way of exception, data may be stored in servers located in the USA.

Cookie Name	Purpose & Usage	Data Collected	Type & Duration	Host
cookie-consent	This cookie remembers your consent preferences regarding cookie files. It ensures that the website complies with your choices.	It may store technical data related to user consent, such as the consent choice (acceptance or rejection of non-essential cookies).	First Party Cookie Strictly necessary (Essential) Cookie 12 months	Our website.
_gat	This cookie enables Google Analytics to regulate the rate of data requests and helps improve website performance by managing data requests during a browsing session.	This cookie may collect technical data related to website usage, such as page views, session duration, and general site interaction patterns. However, it does not collect directly identifiable personal data.	First Party Cookie Performance Cookie (HTTP cookie). Optional Cookie Browsing session	Our website.
_gid	This cookie keeps a unique ID entry, used to generate statistical data on website usage by visitors. It contributes to improving the website's performance and user experience during browsing.	This cookie may collect technical data related to how you interact with our website, such as page views, session duration, and general site interaction and usage patterns. It does not collect directly identifiable data.	First Party Cookie Performance Cookie (HTTP cookie) Optional Cookie Browsing session	Our website.
collect	Sends data, such as visitor behavior and device information, to Google Analytics. While it primarily helps in improving website performance and user experience, it may indirectly collect technical data related to user behavior on the site. It can keep track of the visitor across marketing channels and devices.	This cookie collects information about user's browsing patterns and content interests, but it does not directly collect identifiable personal data.	Third Party Cookie Marketing Cookie (pixel tracker type of cookie) Optional Cookie Browsing session	Our website and Google.

8. Cookies and Profiling

Profiling: We may use profiling techniques in the following contexts:

- **Personalization of User Experience** to customize your website experience based on your preferences and past interactions. This allows us to provide you with content and features that are most relevant to you.
- **Personalized Marketing Communication** involves analyzing your data to deliver targeted ads and marketing messages that align with your interests and behavior.
- **Website Analytics and Performance** to track user behavior, such as page views and clickstream data, to understand how users interact with the site. This data is used to improve website performance, enhance user experience, and optimize content placement.
- **Cookies and Tracking Technologies** are used to collect data on user behavior, preferences, and interactions with our website. This data is valuable for understanding user preferences, providing personalized experiences, and improving website functionality.
- **Security Profiling** based on monitoring and auditing involves tracking user activities, access logs, and compliance data to ensure adherence to security standards and regulations. This is done to maintain the security and integrity of the website, protect against unauthorized access, and demonstrate compliance with legal requirements.

Automated Decision-Making: We do not engage in automated decision-making processes that produce significant legal effects or similarly significant consequences for individuals based solely on automated processing.

In summary, the profiling activities described above are implemented with the intention of enhancing your user experience and improving website performance. We value your privacy and offer options for consent and control over your data preferences. If you have any questions or concerns about our profiling practices, please don't hesitate to contact us using the information provided in our "Contact Us" section.

9. Who Do We Share Your Cookie Data With?

At times, it's necessary for us to share your personal data with others to fulfil our legal and contractual obligations and to pursue our legitimate interests, we may share the data with our affiliates, subsidiaries, or service providers to facilitate our business activity. We take measures to ensure the security and confidentiality of your data when shared.

The following are examples of possible categories of recipients of your data:

Service Providers	These are companies that assist us in managing our business activity, including technical support, hosting, cloud solutions, security and risk management tools, data analysis, and IT services. These partners are contractually bound to comply with our data privacy and security requirements, ensuring the protection of your personal information. They are authorized to access personal data solely for the purposes we specify, contributing to the efficiency and security of our services.
Professional Advisors	We might work with lawyers, accountants, auditors, or consultants who could access your data while providing their services.
Legal and Regulatory Authorities	Occasionally, legal obligations may require us to share email data with law enforcement, regulators, or government authorities.
Business Transfers	If we undergo a merger, asset sale, or significant organizational change, your email data may be transferred to the new entity or owners.

Third-Party Tools and Platforms	We use various third-party tools and platforms to enhance our processes. These tools may process your email data on our behalf.
Other Authorized Recipients	There might be other authorized recipients we have to share data with, depending on specific situations and laws,

10. International Data Transfers

We may need to transfer your data to countries outside the European Economic Area (EEA) or places with different data protection rules. We take steps to protect your data, including:

- **Adequacy Decisions:** If the European Commission says a country has good data protection, we can send data there without extra safeguards, including EU-US Data Privacy
- **EU-US Data Privacy Framework:** The European Commission has approved data transfers from the European Economic Area (EEA) to the United States under the EU-US Data Privacy Framework. Under this framework, your personal data may be transferred to participating U.S. companies without the need for additional safeguards.
- **Standard Contractual Clauses:** We might use these approved contracts to ensure your data is safe when it goes outside the EEA.

The information about the transfers can be obtained through the “Contact Us” section in the Privacy Policy.

11. Your Rights

We are committed to transparency and ensuring that your data subject rights are accessible and cost-free:

Right to Withdraw Your Consent at any time	You can withdraw your consent for the processing of your Personal Data at any time.
Right to Be Informed	You have the right to be informed about how your Personal Data is collected and processed. This includes knowing the purposes of processing, who is processing your data, and how long it will be kept.
Right to Object to Processing	When we process your Data based on public or legitimate interest, you can object to it.
Right to Access Your Data	You can find out if we process your Data, get details about the processing, and a copy of your Data.
Right to Rectify Your Data	You have the right to ensure that your Personal Data is accurate and to request corrections if necessary.
Right to Restrict the Processing of Your Data	You have the right, under certain circumstances, to restrict the processing of your Data. In this case, we will not process the Data for any purpose other than storing it.
Right to have Your Data Erased or otherwise removed	You have the right, under certain circumstances, to obtain the erasure of your Data.
Right to Portability of Your Data	You can receive your Data in a structured, machine-readable format and, if possible, have it sent to another controller. This right applies when your Data is processed automatically, based on your consent, a contract, or pre-contractual obligations.
Right Not to Be Subject to Profiling and Automated Decision-Making	You have the right not to be subjected to solely automated decision-making processes, including profiling, that significantly affect you. This means that important decisions, such as those related to your rights, benefits, or legal matters, should not be made solely by automated systems without human intervention. This right safeguards against unfair or discriminatory automated decisions.
Right to Lodge a complaint	You have the right to bring a claim before the Romanian Supervisory Authority at e-mail: anspdcp@dataprotection.ro sau pe Data Protection RO or directly to the court.

Limitations or Exceptions to Data Subject Rights:

While we respect your rights, legal or legitimate reasons may prevent us from fulfilling some requests. For instance, if it conflicts with our legal obligations or others' rights. We'll explain why if we can't fulfil your request.

Withdrawing Your Consent

You can withdraw your cookie consent at any time. To do so you can **Opt-Out** for non-essential cookies by adjusting your settings in your device or browser. Essential cookies for security will still be active.

If you withdraw consent for non-essential cookies, some website features and personalized content may not be available to you. This may affect your overall user experience on our website.

Withdrawing consent does not affect the lawfulness of any processing that occurred before your withdrawal. We are committed to respecting your choices and privacy preferences.

To request any action regarding your rights, contact us by email at privacy@b2kapital.ro or by postal mail to our head office. Our Data Protection Officer (DPO) will assist you and respond as soon as possible, not later than three months.

12. Cookie Policy Updates

We may update this Cookie Policy from time to time to reflect changes in our privacy practices or legal obligations. We will post the revised version on our website and update the "Effective Date" at the top of this policy. We encourage you to check our Cookie Policy periodically for the latest information on our privacy practices.

We are committed to keeping you informed about our data practices and any updates to our privacy policy. You can access the history of previous versions of this privacy policy by visiting the "**Cookie Policy History**" section on our website. This section provides a record of all previous versions, allowing you to review any changes made over time.