



# INTEGER WEALTH GLOBAL

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## POLICY DOCUMENT

### Website Cookies

Issue: 02 February 2024

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## 1. Introduction and Regulatory Context

This Cookie Policy explains how Integer Wealth Global (IWG) (“IWG”, “we”, “us”, or “our”) uses cookies and similar technologies on its website [www.iwg-domain.eu] (the “Website”).

IWG is a global investment firm established in several exclusively European jurisdictions and operates internationally through the structuring and management of bespoke financial and transactional instruments, including investment funds, and the provision of risk, due diligence, and advisory services to corporate clients and sovereign entities.

IWG operates within regulatory frameworks including, where applicable:

- Directive 2014/65/EU (MiFID II)
- Directive 2011/61/EU (AIFMD)
- Regulation (EU) 2016/679 (GDPR)
- Directive 2002/58/EC (ePrivacy Directive)

This Cookie Policy should be read together with our Privacy Policy and Regulatory Disclosures.

## 2. Professional Audience Disclaimer

The Website is intended exclusively for professional clients and eligible counterparties, as defined under MiFID II, and for institutional, corporate, and sovereign entities.

The Website does not constitute:

- Investment advice
- A personal recommendation
- An offer or solicitation to invest in any financial instrument or fund

Cookies are not used to conduct investor profiling, suitability assessments, or behavioural targeting.



### 3. What Are Cookies?

Cookies are small text files stored on your device when you visit a website. They enable core functionality, enhance security, and support regulatory-compliant website operations.

Cookies may be:

- Session cookies (deleted when the browser closes)
- Persistent cookies (deleted after a defined retention period)

### 4. Legal Basis for Cookie Use

In line with GDPR, ePrivacy, MiFID II record-keeping principles, and AIFMD governance standards:

- Strictly necessary cookies are processed based on legitimate interest (Article 6(1)(f) GDPR)
- All non-essential cookies are processed only with explicit consent (Article 6(1)(a) GDPR)

Consent is logged and retained for compliance and audit purposes.

### 5. Categories of Cookies Used

#### 5.1 Strictly Necessary Cookies

*(Always active – consent not required)*

These cookies ensure:

- Secure access to the Website
- System integrity and availability
- Session continuity
- Consent preference storage

These cookies are essential for:

- Cybersecurity
- Fraud prevention
- Operational continuity required under MiFID II and AIFMD governance expectations

#### 5.2 Functional Cookies *(Optional)*

Functional cookies support:

- Language and jurisdiction preferences
- Accessibility settings
- Secure form continuation



These cookies do not track investment behaviour or user profiling and are activated only with consent.

### **5.3 Analytical / Performance Cookies (Optional)**

Analytical cookies help IWG understand aggregated, anonymised Website usage to:

- Improve technical performance
- Ensure professional-grade usability
- Support internal governance and IT risk oversight

Characteristics:

- No investor profiling
- No individual behaviour tracking
- No decision-making automation

Activated only with explicit consent.

### **5.4 Marketing and Tracking Cookies**

IWG does not use cookies for:

- Retail advertising
- Behavioural marketing
- Product promotion or inducement tracking

Where any communication-effectiveness analytics are used (e.g. professional audience reach metrics), such cookies:

- Are strictly limited in scope
- Are non-profiling
- Require explicit consent

## **6. Third-Party Cookies and Service Providers**

IWG may engage regulated or contractually bound third-party service providers for:

- Website infrastructure
- Cybersecurity
- Analytics (where consent is given)

All third-party providers:

- Are GDPR-compliant
- Are subject to data-processing agreements
- Do not use data for their own purposes

A list of active third-party cookies is available via the Cookie Settings Panel.



## 7. International Data Transfers

If cookie-related data is transferred outside the European Economic Area (EEA), IWG ensures appropriate safeguards, including:

- EU Standard Contractual Clauses (SCCs)
- Equivalent regulatory protections

No cookie-based data is used for cross-border marketing or investor solicitation.

## 8. Cookie Retention Periods

Cookies are retained only for as long as necessary to:

- Fulfil their operational purpose
- Meet regulatory, audit, and security requirements
- Comply with data minimisation principles

Retention periods are reviewed regularly as part of IWG's compliance framework.

## 9. Managing Cookie Preferences

Users can:

- Accept all cookies
- Reject non-essential cookies
- Customise preferences by category

Preferences can be updated at any time through the Cookie Settings link in the Website footer. Blocking essential cookies via browser settings may affect Website functionality.

## 10. Data Subject Rights

Under GDPR, you have the right to:

- Access your personal data
- Rectify inaccurate data
- Request erasure
- Restrict or object to processing
- Withdraw consent at any time
- Lodge a complaint with a supervisory authority

Further details are provided in our Privacy Policy.



## 11. Amendments to This Policy

This Cookie Policy may be updated to reflect:

- Regulatory developments
- Supervisory guidance
- Operational or technical changes

The latest version will always be available on this page with the updated revision date.

## 12. Contact and Regulatory Queries

For questions relating to cookies, data protection, or regulatory compliance, please contact:

**Data Protection Officer**

Integer Wealth Global (IWG)

Email: [compliance@integerwealth.global](mailto:compliance@integerwealth.global)