

# LEGITAM P.S.A.

## COOKIE POLICY

*for the legit.am website and the privacy.legit.am portal*

**Controller:** Legitam Prosta Spółka Akcyjna (a Polish simple joint-stock company, "Legitam P.S.A."), with its registered office at ul. Weselna 5, 46-300 Świercze, Poland.

**Document version:** 1.0 / 2026

**Effective date:** 28 August 2026

### Language Versions and Interpretation

These documents are provided in English, Italian, French, Polish, and German for your convenience.

**For Consumers:** In the event of any material discrepancy between the language versions, the version in the official language of your country of residence (or the language in which you concluded the agreement) shall prevail for the purpose of interpretation, ensuring that your rights under mandatory local consumer protection laws are fully preserved.

**For Non-Consumers (B2B):** The English version shall be the sole governing and legally binding version for the purpose of interpretation.

In all cases, nothing in this clause shall limit or exclude any mandatory rights granted to you by the applicable law of your country of residence.

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**Relationship to other documents:** This Cookie Policy supplements the Privacy Policy — Websites, available at [legal.legit.am/privacy-policy-web.html](https://legal.legit.am/privacy-policy-web.html). The rules on data collected by the Legitam Mobile Application (local data storage, device identifiers) are described in Section 10 of the Privacy Policy — Mobile Application — this document primarily concerns cookies used on the legit.am and privacy.legit.am websites.

## §1. WHAT ARE COOKIES

1.1. Cookies are small text files stored on a User's end device (computer, smartphone, tablet) while using the legit.am and privacy.legit.am websites, enabling the device to be recognised and the website to be displayed appropriately, adapted to the User's individual preferences.

1.2. In addition to cookies, similar technologies with a comparable function may be used (local storage, tracking pixels, web beacons), to which the provisions of this Policy apply accordingly.

## §2. SCOPE OF APPLICATION

2.1. This Cookie Policy applies to the legit.am website (informational/marketing site) and the privacy.legit.am portal (Account and legal-documents management portal).

2.2. The Legitam Mobile Application, being a native application for iOS and Android, does not use cookies in the browser sense. The Application uses local data storage and device identifiers (including Device ID and advertising identifiers IDFA/GAID), the rules for which are described in detail in Sections 2.5 and 10 of the Privacy Policy — Mobile Application. Consent to the use of advertising identifiers within the Application is obtained via native operating-system mechanisms (App Tracking Transparency on iOS, system permissions on Android).

2.3. The legal.legit.am site, where Legitam's legal documents are published, does not use cookies. It only stores the language version selected by the User in the browser's local storage (localStorage); this storage is strictly necessary to provide the feature requested by the User and does not require consent.

### §3. CATEGORIES OF COOKIES USED

The Controller's websites may use the following categories of cookies:

- Necessary (essential) — enable the basic functioning of the website (e.g., maintaining a session, form security, remembering the User's cookie-consent choice). These do not require the User's consent but the User is informed of them in accordance with Article 399(3) of the Polish Electronic Communications Law.
- Functional — remember the User's choices (e.g., language, display settings) in order to improve the User's experience on the website. These require the User's consent.
- Analytics / statistics — used to analyse how the website is used (e.g., number of visits, traffic sources) in order to improve the quality of the website's content and functionality. These require the User's consent.
- Marketing — used to display personalised marketing content and to measure the effectiveness of promotional activities. These require the User's consent. The Controller does not currently use third-party marketing cookies; should this change, this Policy will be updated accordingly.

### §4. ILLUSTRATIVE LIST OF COOKIES USED

The table below sets out illustrative cookies that may be used on the Controller's websites. This list is indicative and may change as the website evolves; the current list is always available in the cookie-settings panel on the website.

| Name                  | Provider                      | Category  | Purpose                                                           | Duration        |
|-----------------------|-------------------------------|-----------|-------------------------------------------------------------------|-----------------|
| cookie_consent        | legit.am (own)                | Necessary | Remembers the User's cookie-consent decision.                     | 6 months        |
| PHPSESSID             | legit.am (own)                | Necessary | Maintains the User's session while browsing the site.             | browser session |
| wordpress_test_cookie | legit.am (WordPress)          | Necessary | Checks whether the User's browser supports cookies.               | browser session |
| _ga, _ga_*            | Google Analytics (Google LLC) | Analytics | Distinguishes unique Users and analyses website visit statistics. | up to 13 months |
| _gid                  | Google Analytics (Google LLC) | Analytics | Distinguishes Users over a short period for statistical purposes. | 24 hours        |

Note: the presence and scope of Google Analytics cookies depends on the current configuration of the analytics tools on the website and is subject to change. The Controller recommends periodically verifying this list as part of a technical audit of the website.

### §5. LEGAL BASIS AND CONSENT

5.1. The use of cookies other than necessary ones requires the User's prior, freely given, specific, informed, and unambiguous consent, in accordance with Articles 399–405 of the Polish Act of 12 July 2024 — Electronic Communications Law (Journal of Laws 2024, item 1221), which replaced the Telecommunications Law as of 10 November 2024, read together with Article 4(11) and Article 7 of the GDPR.

5.2. To the extent cookies involve the processing of personal data (e.g., identifying a User or analysing their activity), the provisions of the GDPR additionally apply — the legal basis for processing is then the User's consent (Article 6(1)(a) GDPR) or, in the case of necessary cookies, the Controller's legitimate interest in ensuring the proper functioning of the website (Article 6(1)(f) GDPR).

5.3. The absence of consent to cookies other than necessary ones does not restrict the ability to use the website's basic functionalities.

## §6. MANAGING CONSENT AND COOKIE SETTINGS

6.1. On a User's first visit to the website, a cookie banner is displayed, allowing the User to: accept all cookies, reject all cookies other than necessary ones (an option displayed with the same prominence as acceptance), or make a choice broken down by category.

6.2. The User may change or withdraw consent at any time via the cookie-settings panel available in the website's footer.

6.3. Regardless of the website's settings, the User may manage cookies directly in their browser settings, including deleting cookies already stored or blocking their storage in the future. Please note that blocking certain cookies may affect the functionality of the website.

## §7. THIRD-PARTY COOKIES

7.1. Certain cookies may be placed by third parties cooperating with the Controller (e.g., providers of analytics tools), in accordance with the list set out in §4.

7.2. In the case of Google Analytics cookies, data is processed in accordance with Google's privacy policy, available at [policies.google.com/privacy](https://policies.google.com/privacy). Users may opt out of Google Analytics tracking by installing the Google Analytics Opt-out Browser Add-on.

## §8. RETENTION PERIODS FOR COOKIES

The retention period for individual cookies is set out in the table in §4. As a general rule, session cookies are automatically deleted upon closing the browser, while persistent cookies are stored for the period specified in the given cookie's parameters or until manually deleted by the User.

## §9. USER RIGHTS

To the extent cookies involve the processing of personal data, the User has the rights described in detail in the Privacy Policy — Websites (access, rectification, erasure, restriction of processing, data portability, objection, and the right to lodge a complaint with the President of the Personal Data Protection Office). Requests in this regard should be directed to [dpo@legit.am](mailto:dpo@legit.am).

## §10. CHANGES TO THIS COOKIE POLICY

The Controller reserves the right to amend this Cookie Policy, in particular in connection with changes to the tools used or changes in law. The Controller will provide at least 14 days' advance notice of any material changes via an appropriate notice on the website.

## §11. CONTACT

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|-----------------------------------|--------------------------------------------------------|
| <b>Controller:</b>                | Legitam P.S.A., ul. Weselna 5, 46-300 Świercze, Poland |
| <b>E-mail (privacy, cookies):</b> | <a href="mailto:privacy@legit.am">privacy@legit.am</a> |
| <b>Data Protection Officer:</b>   | <a href="mailto:dpo@legit.am">dpo@legit.am</a>         |
| <b>Effective date:</b>            | 28 August 2026                                         |

*This Cookie Policy is effective as of 28 August 2026 | Legitam P.S.A.*