CARTLY SÀRL

COOKIE POLICY – AUGUST 2026 EDITION

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1. Preamble

1.1. The CARTLY® platform consists of a web application presented in the form of a website (https://cartlyapp.com/en/), together with virtual business cards in HTML format (hereinafter also the "**Platform**"), operated by the company CARTLY Sàrl (CHE-312.542.611) (hereinafter also "**we**" or the "**Provider**"), whose registered office is located at Route de Villars 23, 1700 Fribourg, Switzerland (hello@cartlyapp.com / +41 58 255 03 44).

1.2. CARTLY® offers its clients access to a Platform allowing the creation and management of virtual business cards that can be exchanged through various media – in particular by means of an Internet link sent via SMS, WhatsApp, or by scanning a QR code, as well as numerous other sharing methods available on the user's device (AirDrop, social networks, messaging applications, email, email signature, MS Teams, etc.) –, the sharing of contact information by means of virtual business cards, and the creation of email signatures (hereinafter also the "**Services**"). The Services are available in three plans: Starter account, Pro account and Business account. The details of these plans are presented on the Platform and may change at any time. The Platform enables the client/user (hereinafter also the "**User**" or "**you**") to create a personal account (hereinafter also the "**User Account**") allowing them to *upload* text, images, graphics, links, audio and/or video content, etc. (hereinafter also "**User Content**") in order to create, publish on the Internet and share their virtual business cards and email signatures. To access the Platform, the User must have a standard browser (e.g. Google Chrome, Firefox, Microsoft Edge, Safari, etc.) on a device with an Internet connection (e.g. computer, smartphone, tablet, etc.). With a Pro or Business account, the User may, through their User Account, grant access to the Services to other users under their control (hereinafter also "**Sub-users**" or "**you**"). For example, a company with a Business account comprising 250 virtual business cards may, as the User of a Business account, grant access to the Services to 250 of its employees, who will be its Sub-users. Sub-users also have a User Account onto which they may likewise *upload* User Content. In addition, any person consulting a CARTLY® virtual business card (hereinafter also "**Third-Party Contact**" or "**you**") may, by means of the "Send my contact" button (or equivalent) located on the virtual business cards, share User Content by means of an electronic form (hereinafter also "**Contact Form**") with a User or a Sub-user.

1.3. This Cookie Policy describes the manner in which we use cookies.

1.4. **Please read the Cookie Policy carefully.**

2. Use of cookies

2.1. Our Platform uses cookies. A cookie is a small file that is sent with the pages of our Platform and/or applications and that is stored by your browser on the hard drive of your computer, mobile phone, connected watch or tablet. The information stored therein may be returned to our servers on a subsequent visit.

2.2. Cookies are information files that your Internet browser automatically stores on the hard drive of your device when you visit our Platform.

2.3. The use of cookies is of great importance to the proper functioning of our Platform. Thanks to the contribution of visitors, we are able to improve the use of our Platform and in particular to make it more user-friendly, more efficient and more attractive.

2.4. Most Internet browsers automatically accept cookies. However, you can configure your browser so that no cookie is stored on your device or so that a warning message is systematically displayed whenever a new cookie is created.

3. Legal bases

3.1. We use the tools necessary for the functioning of our Platform on the basis of our legitimate interest in enabling you to use our Platform in a more practical and individual manner and to use it as quickly as possible. In certain cases, these tools may also be necessary for the performance of a contract or for the carrying out of pre-contractual steps.

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3.2. Your consent is required for the use of certain cookies: cookies that are not strictly necessary (audience measurement, tracking, advertising and social networks) are only placed after your prior consent, collected via our cookie-management banner (Cookieyes), which allows acceptance or refusal by category, refusal being as simple as acceptance. You may modify or withdraw your consent at any time via the link accessible at the bottom of the page. Strictly necessary cookies (including the session cookie and the Cookieyes cookie) do not require consent.

3.3. Our Platform uses the "Cookieyes" code to collect and manage consent and any revocations. When you make a decision in the consent banner, a cookie is set ("Cookieyes cookie") which records your consent or your refusal. This cookie is technically necessary and we use it on the basis of our legitimate interest in documenting your consent. The access to and storage of information are absolutely necessary in these cases. If you delete your cookies, we will ask for your consent again when you next access our Platform.

3.4. You may revoke your consent for certain tools at any time. To do so, please refer to the "Blocking and deleting cookies" section below.

4. The types of cookies used and their purposes

4.1. We use the following cookies:

a) **Functional cookies**: they allow us to improve the functioning of our Platform and to make it more user-friendly for visitors. For example, we store your login data.

b) **Audience measurement cookies**: they ensure that an anonymous cookie is generated each time you visit our Platform. These cookies make it possible to know whether or not you have already visited the site before. A cookie is created only on the first visit. On subsequent visits, the use of the already existing cookie is automatic. This cookie is used solely for statistical purposes. In this way, the following data may be collected:

i. The number of unique visitors;

ii. How frequently visitors visit the site;

iii. Which pages visitors consult;

iv. How long visitors consult a particular page;

v. The page from which visitors leave the site.

c) **Tracking cookies**: they make it possible to analyze your browsing, your consultation or consumption habits on our Platform, with the aim of offering you targeted advertising or personalized services. The profile that is established on the basis of this data is not linked to your name, address, email address, etc., but serves solely to match advertisements to your profile, so that they are as relevant as possible for you. We collect your consent for these cookies. They will not be installed without your consent.

d) **Third-party cookies**: they make it possible to track the pages you visit in order to create your personal profile. This profile is not linked to your name, address, email address, etc., as indicated above, but serves solely to identify you as a unique visitor and to tailor advertisements to your profile so that they are as relevant as possible for you. We collect your consent for these cookies. These cookies will not be installed without your consent.

e) **Social-network cookies**: they allow social networks to record the articles and pages you share via their share buttons. They may also contain tracking cookies that trace your browsing behavior on the Internet.

f) **Cookies for improving our Platform**: they make it possible to test different versions of a web page in order to find out which page is better used.

g) **Session-recording and usage-mapping cookies**: they record all or part of your browsing

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(mouse movements, clicks, scrolling) and generate heatmaps or session replays in order to analyze the ergonomics of our Platform. This processing is more detailed than mere statistical audience measurement. We collect your consent for these cookies; they will not be installed without your consent.

5. List of cookies used

5.1. The table below lists the cookies used on our Platform, classified according to the categories of our consent-management tool (Cookieyes). Audience-measurement, analytics and advertising cookies are only placed after your prior consent; strictly necessary and functional cookies rest on our legitimate interest.

5.2. **Strictly necessary cookies (no consent required)**

Cookie name	Provider / tool	Purpose	Retention period
__hssc	HubSpot	Management of the session state.	1 hour
rc::b	Google reCAPTCHA Enterprise	Distinction between humans and robots for the protection of forms.	Session
rc::c	Google reCAPTCHA Enterprise	Distinction between humans and robots for the protection of forms.	Session
rc::f	Google reCAPTCHA Enterprise	Persistent reCAPTCHA Enterprise identifier (anti-robot protection).	Permanent
_csrf	CARTLY (own cookie)	Cross-site request forgery (CSRF) protection token.	Session
sessionId	Stonly	Maintenance of the user's session.	Permanent
chatbase_anon_id	Chatbase	Anonymous visitor identifier for the conversational assistant (chatbot).	Session
wp_consent_level	WP Consent API	Records the visitor's overall consent level.	1 month
wp_consent_statistics-anonymous	WP Consent API	Records consent to anonymous statistics.	1 month
wp_consent_functional	WP Consent API	Records consent to functional cookies.	1 month
wp_consent_marketing	WP Consent API	Records consent to marketing cookies.	1 month
cookieyes-consent	Cookieyes	Records your consent choice by cookie category.	1 year

5.3. **Functional cookies (no consent required)**

Cookie name	Provider / tool	Purpose	Retention period
__cf_bm	Cloudflare	Bot management; distinguishes automated traffic from human traffic.	1 hour
wp-wpml_current_language	WPML	Stores the selected language (FR / EN / DE).	Session

5.4. **Audience-measurement and analytics cookies (consent required)**

Cookie name	Provider / tool	Purpose	Retention period
_ga_*	Google Analytics (GA4)	Traffic statistics; distinguishes visitors and sessions.	1 year 1 month 4 days

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_gcl_au	Google Ads	Measurement of advertising conversions from one page to another.	3 months
hubspotutk	HubSpot	Visitor tracking and contact deduplication when forms are submitted.	Session
_clck	Microsoft Clarity	Session recording and heatmaps; retains the Clarity identifier.	1 year
_clsk	Microsoft Clarity	Groups a visitor's page views into a single session (session recording).	1 day
_hjSessionUser_*	Hotjar	Behavioral analysis; Hotjar visitor identifier.	1 year
__hssrc	HubSpot	Indicates whether the browser has been restarted (reset of the HubSpot session cookie).	Session
_cfuvid	Cloudflare	Session consistency (distinct from __cf_bm).	Session

5.5. **Advertising cookies (consent required)**

Cookie name	Provider / tool	Purpose	Retention period
test_cookie	DoubleClick (Google)	Checks whether the browser supports advertising cookies.	15 minutes

5.6. **Certain data is processed on servers located in the United States. These transfers are carried out on the basis of an adequacy decision (in particular the Swiss-U.S. Data Privacy Framework, Google LLC being certified thereunder) or, failing that, of appropriate safeguards such as the standard contractual clauses.** For more information, see our Privacy Policy [https://cartlyapp.com/files/Privacy-policy.pdf].

5.7. Further information can be consulted on the respective websites of the companies providing the aforementioned tools.

6. Your rights with regard to your personal data

6.1. You have a right of access, rectification, restriction and erasure of your personal data. In addition, you have the right to object to the processing of personal data and the right to the portability of your data. You may exercise these rights by sending us an email at the following address: privacy@cartlyapp.com. In order to prevent abuse, we may ask you to identify yourself on our Platform.

6.2. For the remainder, we refer you to our Privacy Policy [https://cartlyapp.com/files/Privacy-policy.pdf].

7. Blocking and deleting cookies

7.1. You may at any time modify or withdraw your consent to non-essential cookies via the "Cookie preferences" link (Cookieyes) accessible at the bottom of the Platform's pages. You can easily block and delete cookies yourself at any time through your Internet browser. You can also configure your Internet browser so as to receive a message when a cookie is installed. You can also indicate that certain cookies may not be installed. To do so, please consult the help function of your Internet browser. If you delete the cookies from your Internet browser, this may, where applicable, have consequences for the use of our Platform and impair your experience, which is why we do not recommend doing so.

7.2. Please note that refusing cookies may prevent the proper functioning of our Platform.

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Refusing non-essential cookies does not prevent access to the Platform; only certain comfort features may be affected. Blocking strictly necessary cookies may, by contrast, prevent the proper functioning of the Platform. Furthermore, refusing cookies does not mean that you will not see any advertising. Advertisements will simply no longer be tailored to your interests and may therefore appear more often.

7.3. The steps to follow in order to adjust your settings vary from one browser to another. If necessary, consult the help function of your browser, or go to one of the links below to access your browser's manual directly.

a) Firefox : https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox?redirectslug=effacer-les-cookies-pour-supprimer-les-information&redirectlocale=fr;

b) Google Chrome : https://support.google.com/chrome/answer/95647?co=GENIE.Platform&hl-fr&hl=en&sjid=6431699931478896182-EU;

c) Microsoft Edge : https://support.microsoft.com/en-US/edge/manage-cookies-in-microsoft-edge-view-allow-block-delete-and-use;

d) Safari : https://support.apple.com/guide/safari/manage-cookies-sfri11471/mac.

8. New developments and unforeseen cookies

8.1. On some of the pages of our Platform, we may use content that is hosted on other sites and that is made accessible on our Platform by means of certain codes (embedded content). These codes often use cookies. We have, however, no control over what these third parties do with their cookies.

8.2. It is also possible that, through our Platform, cookies are placed by other persons. If you find on our Platform cookies that we have not identified, please let us know by email at the address privacy@cartlyapp.com. You may also contact the third party directly and ask them which cookies they place, what the reason is, what the lifespan of the cookie is and what measures are taken to protect your privacy.

8.3. If you have any questions and/or comments, please contact us at the following email address: privacy@cartlyapp.com.

9. Links to other resources

9.1. Our Platform contains links to other resources that do not belong to us and that we do not control (for example links to social networks). Please be aware that we are not responsible for the cookie practices of these third parties. When you access the services of these third parties via our Platform, it is possible that these third parties collect data concerning you. We encourage you to be careful to read their own cookie policy.

10. Languages

10.1. You may consult the Cookie Policy in different languages. **However, if you consult the Cookie Policy in a language other than French, you acknowledge that this is an automated translation, without legal value, provided for information purposes, of the original version written in French.** In the event of contradictions or possible differing interpretations between the various versions, **only the French version is authoritative and has legal value**.

11. Changes to our Cookie Policy

11.1. We may modify this Cookie Policy from time to time, in order to adapt it to the use of our Platform, for example when we modify our Platform or the rules concerning it.

11.2. We will inform you as far as possible of any significant change to this Cookie Policy.

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However, we recommend that you consult this Cookie Policy regularly in order to stay up to date and informed of the manner in which we use cookies.

11.3. In the event of substantial modifications to our Cookie Policy, you will be kept informed by email or via the Platform.

11.4. Any new version of the Cookie Policy will enter into force immediately after its publication on our Platform, unless otherwise indicated. For cookies subject to consent, your consent is never presumed from the mere fact of browsing: it is collected, and may be withdrawn, via our cookie-management tool (Cookieyes).

11.5. In the event of disagreement with the new Cookie Policy, you may refuse non-essential cookies via our cookie-management tool or cease using the Platform. Any contractual consequences (termination, refund) are governed exclusively by the Terms and Conditions.

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