

Cookie Policy

Oxen Finance Platform

Escrowfy GmbH

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Classification: PUBLIC

1. Introduction

1.1.1. This Cookie Policy (“Policy”) explains how Escrowfy GmbH, operating under the Oxen Finance brand (“Oxen”, “we”, “our”), uses cookies and similar tracking technologies on the website at oxen.finance and any associated digital properties (collectively, the “Website”).

1.2. This Policy should be read in conjunction with our Privacy Policy (OXN-POL-PRIV-001), which provides detailed information about how we collect, use, and protect your personal data.

1.3. By continuing to use the Website with cookies enabled, or by clicking “Accept” on our cookie consent banner, you consent to the use of cookies as described in this Policy, except for strictly necessary cookies which do not require consent.

2. What Are Cookies?

2.1. Cookies are small text files that are placed on your device (computer, tablet, smartphone) when you visit a website. They are widely used to make websites work more efficiently, to provide a better user experience, and to supply information to the operators of the website.

2.2. In addition to cookies, we may use similar tracking technologies, including:

Web beacons (pixel tags): Small transparent images embedded in web pages or emails that track whether a page has been viewed or an email has been opened;

Local storage: Browser-based storage mechanisms (such as HTML5 local storage) that allow websites to store data locally on your device;

Session storage: Similar to local storage but cleared when the browser session ends;

Fingerprinting technologies: Techniques that collect information about your device configuration (e.g., browser type, screen resolution, installed plugins) to create a unique identifier.

2.3. References to “cookies” in this Policy include all such similar technologies unless the context requires otherwise.

3. Identification of Conflicts

We classify cookies into four categories based on their purpose. The table below describes each category, its purpose, and whether your consent is required.

Category	Category	Category	Description and Examples
Strictly Necessary	Essential for the operation of the Website. These cookies enable core functionality such as security, session management, authentication, load balancing, and cookie consent preferences. The Website cannot function properly without these cookies.	Session or up to 12 months	No (exempt under ePrivacy Directive Art. 5(3); Swiss TCA Art. 45c)
Functional	Enable enhanced functionality and personalisation, such as remembering your language preference, region, display settings, or form data you have previously entered. These cookies are not strictly necessary but improve your experience.	Up to 12 months	Yes
Analytics / Performance	Collect aggregated, anonymised data about how visitors use the Website, including pages visited, time spent, bounce rate, referral sources, and navigation paths. This helps us understand usage patterns and improve the Website.	Up to 26 months	Yes
Marketing / Advertising	Track visitors across websites to display targeted advertisements. These cookies may be set by us or by third-party advertising partners to build a profile of your interests and show relevant advertisements on other websites.	Up to 13 months	Yes

4. Specific Cookies in Use

The following table provides details of the specific cookies currently used on the Website. This list is reviewed and updated periodically.

Cookie Name	Provider	Purpose	Duration	Duration
__session	oxen.finance	Maintains user session state and authentication	Session	Strictly Necessary
__csrf_token	oxen.finance	Protects against cross-site request forgery attacks	Session	Strictly Necessary
cookie_consent	oxen.finance	Stores your cookie consent preferences	12 months	Strictly Necessary
_cf_bm	Cloudflare	Bot management and DDoS protection	30 minutes	Strictly Necessary
cf_clearance	Cloudflare	Records that a visitor has passed a security challenge	30 minutes	Strictly Necessary
locale	oxen.finance	Stores your preferred language setting	12 months	Functional
_ga	Google Analytics	Distinguishes unique visitors by assigning a randomly generated ID	26 months	Analytics
_ga_*	Google Analytics	Maintains session state for Google Analytics 4	26 months	Analytics
_gid	Google Analytics	Distinguishes visitors within a 24-hour window	24 hours	Analytics
_gat	Google Analytics	Throttles request rate to limit data collection on high-traffic sites	1 minute	Analytics
_fbp	Meta (Facebook)	Tracks visitors for targeted advertising on Facebook and Instagram	3 months	Marketing
_gcl_au	Google Ads	Stores conversion tracking information for Google Ads campaigns	3 months	Marketing
li_sugr	LinkedIn	Browser identifier for LinkedIn ad tracking and conversion	3 months	Marketing

\$crisp_*	Crisp	Live chat widget functionality, visitor identification, and session state	6 months	Functional
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Note: This list is indicative and may change as we update our Website, integrate new tools, or change service providers. We review this list at least quarterly. Cookies marked with an asterisk (*) indicate variable-name cookies where the exact name includes a dynamically generated identifier.

5. Third-Party Cookies

5.1. Some cookies on our Website are set by third-party services that we use, including analytics providers (e.g., Google Analytics), advertising platforms (e.g., Meta, Google Ads, LinkedIn), security services (e.g., Cloudflare), and customer communication tools (e.g., Crisp).

5.2. We do not control the cookies set by these third parties. Each third-party provider operates under its own cookie and privacy policies. We encourage you to review their respective privacy policies:

Google: <https://policies.google.com/privacy>

Meta (Facebook/Instagram): <https://www.facebook.com/privacy/policy>

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

Cloudflare: <https://www.cloudflare.com/privacypolicy>

Crisp: <https://crisp.chat/en/privacy>

5.3. We have entered into data processing agreements with third-party providers where required by applicable data protection law. Third-party analytics data is processed in anonymised or pseudonymised form wherever possible.

6. Legal Basis for Using Cookies

The following conflicts are inherent in the nature of our business model. We have implemented specific controls for each:

Cookie Category	Legal Basis (EEA / UK)	Legal Basis (Switzerland)
Strictly Necessary	Exempt from consent under ePrivacy Directive Art. 5(3); GDPR Art. 6(1)(f) legitimate interest	Exempt under Swiss Telecommunications Act (TCA) Art. 45c; nFADP Art. 31(1) overriding interest
Functional	Consent under ePrivacy Directive Art. 5(3); GDPR Art. 6(1)(a)	Implied consent under TCA Art. 45c; nFADP Art. 31(2)(a)
Analytics	Consent under ePrivacy Directive Art. 5(3); GDPR Art. 6(1)(a)	Implied consent; nFADP Art. 31(2)(a); anonymised data may be processed under Art. 31(1)

Marketing	Consent under ePrivacy Directive Art. 5(3); GDPR Art. 6(1)(a)	Consent under nFADP Art. 31(2)(a); TCA Art. 45c
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UAE / ADGM: Where applicable, we rely on consent for non-essential cookies in accordance with the ADGM Data Protection Regulations 2021 and UAE Federal Decree-Law No. 45 of 2021.

7. How to Manage Your Cookie Preferences

7.1 Cookie Consent Banner

When you first visit our Website, a cookie consent banner is displayed, allowing you to accept or reject non-essential cookies. You can modify your preferences at any time by clicking the “Cookie Settings” link available in the footer of every page on the Website.

7.2 Browser Settings

You can also manage cookies through your browser settings. Most browsers allow you to:

- View the cookies stored on your device;
- Delete some or all stored cookies;
- Block all cookies or only third-party cookies;
- Set preferences for specific websites.

Instructions for managing cookies in common browsers:

- Google Chrome: Settings → Privacy and Security → Cookies and other site data
- Mozilla Firefox: Settings → Privacy & Security → Cookies and Site Data
- Safari: Preferences → Privacy → Manage Website Data
- Microsoft Edge: Settings → Privacy, Search, and Services → Cookies

7.3 Opt-Out of Analytics and Advertising

You can opt out of specific analytics and advertising cookies using the following tools:

- Google Analytics: Install the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout>
- Google Ads personalisation: <https://adssettings.google.com>
- Meta (Facebook) ad preferences: <https://www.facebook.com/adpreferences>
- LinkedIn ad preferences: <https://www.linkedin.com/psettings/advertising>
- General industry opt-out (EU): <https://www.youronlinechoices.eu>

- General industry opt-out (US): <https://optout.aboutads.info>

7.4 Consequences of Disabling Cookies

8.1. Some browsers offer a “Do Not Track” (DNT) setting that sends a signal to websites you visit indicating that you do not wish to be tracked. There is currently no universally accepted standard for how websites should respond to DNT signals.

8.2. At present, our Website does not respond to DNT signals. However, you can manage your cookie and tracking preferences using the methods described in Section 7 above.

8. Do Not Track Signals

8.1. All Relevant Persons receive training on conflicts of interest as part of their induction and on an annual basis thereafter. Training covers the identification of conflicts, reporting obligations, personal conduct requirements, and the consequences of non-compliance.

8.2. Additional targeted training is provided to individuals in roles that present heightened conflict risk, including client-facing staff, treasury, compliance, and senior management.

8.3. Training records are maintained by the Compliance function and are available for regulatory inspection.

9. International Data Transfers via Cookies

9.1. Some cookies, particularly those set by third-party analytics and advertising providers (e.g., Google, Meta), may involve the transfer of data to countries outside Switzerland, the EEA, or the United Kingdom, including the United States.

9.2. Where such transfers occur, we ensure appropriate safeguards are in place in accordance with our Privacy Policy (Section 6), including EU/Swiss Standard Contractual Clauses (SCCs), the EU-US Data Privacy Framework (where applicable), or other approved transfer mechanisms.

10. Cookie Retention Periods

10.1. Session cookies are automatically deleted when you close your browser.

10.2. Persistent cookies remain on your device for the duration specified in the cookie details (see Section 4), or until you delete them manually.

10.3. We review cookie retention periods periodically to ensure they are proportionate to the purpose for which the cookie is used, in accordance with the data minimisation principle.

11. Changes to This Policy

- 11.1. We may update this Cookie Policy from time to time to reflect changes in the cookies we use, changes in applicable law, or updates to our Website. Any revised version will be published on the Website with an updated Effective Date.
- 11.2. Where changes are material, we will re-display the cookie consent banner so that you can review and update your preferences.
- 11.3. The most current version of this Policy is available at oxen.finance/cookies.

12. Contact

If you have questions about our use of cookies, please contact:

Data Protection Contact	dpo@oxen.finance
General Enquiries	support@oxen.finance
Postal Address	Escrowfy GmbH, Bahnhofstrasse 7, 6300 Zug, Switzerland