

COOKIE POLICY & DIGITAL TRACKING DIRECTIVE

topsend.live Application & Web Ecosystem

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1. INTRODUCTION & SCOPE OF POLICY

- 1.1. This Cookie Policy explains how **CERTECH BORROW s.r.o.** (IČO: 23706058, Chvalská 718/10, Prague 9, Czech Republic) utilizes cookies, local storage objects, and similar tracking technologies across the **topsend.live** web portal and mobile application interface.
- 1.2. This Policy operates in conjunction with our [Privacy Policy](#) and sets out the framework for compliance with the EU ePrivacy Directive (Directive 2002/58/EC as amended) and Regulation (EU) 2016/679 (GDPR).

2. CATEGORIES OF COOKIES WE EMPLOY

Cookie Category	Purpose & Operational Function	Retention Period
Strictly Necessary	Essential session tokens, CSRF protection, secure user authentication, and automated IP geofencing verification. Required for app stability.	Session / Up to 30 Days
Functional & Preferences	Stores user interface settings, selected language, local currency displays, and UI state parameters.	1 Year
Security & Anti-Fraud	Monitors suspicious connection attempts, prevents brute-force attacks, and maintains SDK session handshakes for identity verification (SumsuB).	Up to 90 Days
Performance & Analytics	Anonymized telemetry, app crash logs, and API response speed indicators to optimize software interface execution.	Up to 12 Months

3. LAWFUL BASIS FOR PROCESSING

- 3.1. **Strictly Necessary & Security Cookies:** Deployed pursuant to Article 6(1)(f) GDPR (Legitimate Interests) and Article 6(1)(b) GDPR (Performance of Contract) to ensure platform security, fraud prevention, and system delivery.
- 3.2. **Analytics & Preference Cookies:** Deployed strictly upon obtaining your explicit consent (Article 6(1)(a) GDPR) via our interactive cookie banner during your initial platform session.

4. THIRD-PARTY SDKS & INTEGRATIONS

Certain essential functional features integrate third-party Software Development Kits (SDKs) and secure API endpoints (e.g., Sum Verification Ltd for identity verification). These integrations may place temporary session tokens strictly required for cryptographic security and verification workflow completion.

5. MANAGING & PREFERENCE CONTROLS

- 5.1. Users may modify, revoke, or customize cookie preferences at any time via the "Cookie Settings" link located in the **topsend.live** footer or within the app configuration panel.
- 5.2. Note: Disabling Strictly Necessary or Security cookies via browser settings may prevent access to secure app areas and cause session failure during API transaction handshakes.

APPROVED & ISSUED BY CERTECH BORROW S.R.O.:

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