

# COOKIE POLICY

## Bootyn.com digital content provider platform

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## 1. Introduction

The Bootyn.com website (hereinafter: "Platform") is operated by SPONDEX LTD (registered office: Voukourestiou 25, NEPTUNE HOUSE, 1st floor, Flat/Office 11, Zakaki, 3045 Limassol, Cyprus; company registration number HE 490894; represented by Charalampos Lafazanis, Director).

The Platform uses cookies and similar technologies. The purpose of this Cookie Policy is to inform you about what cookies we use, the legal basis on which we use them, and how you can manage your cookie settings. This Cookie Policy is to be read together with the Privacy Policy and the General Terms and Conditions.

## 2. What is a cookie?

A cookie is a small text file that a website stores on your device (computer, mobile phone, tablet) when you visit it. Cookies enable the website to recognize your device, remember your settings and preferences, and measure how the website is used. In this Cookie Policy, the term "cookie" also covers similar technologies such as local storage, session storage, web beacons, pixels and software development kits, where these technologies process data stored on or read from your device.

### 3. Legal basis for cookie use

Under Article 5(3) of Directive 2002/58/EC (the "ePrivacy Directive"), as transposed into Cypriot law, the storage of, or access to, information on the User's device requires the User's prior consent, except where such storage or access is strictly necessary to provide a service explicitly requested by the User. Personal data subsequently processed via cookies is governed by Regulation (EU) 2016/679 (GDPR) and Cypriot Law 125(I)/2018.

Accordingly:

- strictly necessary cookies (Section 4) are placed without prior consent on the basis of Article 5(3) ePrivacy and Article 6(1)(f) GDPR (legitimate interest);
- all other cookies (Sections 5–7) are placed only after the User has given explicit, informed, freely given and unambiguous consent through the cookie banner, on the basis of Article 5(3) ePrivacy and Article 6(1)(a) GDPR;
- the User can withdraw consent at any time through the mechanisms set out in Section 11; withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

### 4. Strictly necessary cookies

These cookies are essential for the basic operation of the Platform and the security of Users. They are placed without prior consent on the legal basis described in Section 3.

Cookie / Identifier	Provider	Purpose	Duration
session_id	Bootyn.com	Maintains login state and links the User to their authenticated session.	Session
security_token	Bootyn.com	Cross-Site Request Forgery (CSRF) protection token.	Session
verify_status	Bootyn.com	Stores the result of the Shufti Pro age and identity verification, to avoid asking for verification on every page.	Up to 12 months
cookie_consent	Bootyn.com	Stores your cookie-consent choices so we do not re-display the banner unnecessarily.	12 months
language_preference	Bootyn.com	Stores your selected display language.	12 months
age_gate_passed	Bootyn.com	Records that the adult-content age gate has been confirmed for the current session.	Session

### 5. Functional cookies

Functional cookies enable enhanced functionality and personalization. They are placed only after explicit consent through the cookie banner.

Cookie / Identifier	Provider	Purpose	Duration
user_preferences	Bootyn.com	Stores user-interface settings, such as display mode and theme.	12 months
volume_settings	Bootyn.com	Stores video-player volume preferences.	30 days
content_filters	Bootyn.com	Stores content-filter preferences (categories, tags).	12 months
timezone	Bootyn.com	Stores the User's preferred time-zone for time-stamps.	12 months
recently_viewed	Bootyn.com	Lists recently viewed content for quick access.	30 days

## 6. Performance and analytics cookies

Analytics cookies help us understand how Users interact with the Platform, so that we can improve it. They are placed only after explicit consent through the cookie banner. Where these cookies are provided by third parties, the relevant third-party privacy policy also applies.

Cookie / Identifier	Provider	Purpose	Duration
_ga	Google LLC (Google Analytics)	Distinguishes unique Users for the purpose of aggregate analytics. Configured with IP-anonymization where supported.	Up to 13 months
_ga_<container-id>	Google LLC (Google Analytics 4)	Stores a session identifier for the GA4 property.	Up to 13 months
_gid	Google LLC (Google Analytics)	Distinguishes Users in the past 24 hours.	24 hours
_gat	Google LLC (Google Analytics)	Throttles the rate of requests to Google Analytics servers.	1 minute
page_views	Bootyn.com	Counts page views per session for internal analytics.	Session
session_duration	Bootyn.com	Measures session duration for internal analytics.	Session

Google Analytics is provided by Google LLC. Google's privacy practices are described at <https://policies.google.com/privacy>. We have entered into a data-processing agreement with Google and configure Google Analytics to anonymize IP addresses and to disable advertising features by default.

## 7. Marketing cookies

Marketing cookies are used to display promotions that are likely to be of interest to you and to measure the effectiveness of marketing campaigns. They are placed only after explicit consent through the cookie banner.

Cookie / Identifier	Provider	Purpose	Duration
marketing_id	Bootyn.com	Tracks marketing-campaign attribution for conversions on the Platform.	90 days
referral_source	Bootyn.com	Stores the source of the User's arrival on the Platform (e.g. affiliate link, organic search).	90 days
campaign_data	Bootyn.com	Records campaign parameters (utm_source, utm_medium, utm_campaign) for attribution analysis.	90 days

## 8. Third-party cookies

Some third parties whose services we use may also place cookies on your device when you interact with the Platform. These third parties act as independent or joint controllers within the meaning of GDPR, and their own privacy policies apply.

### 8.1 Shufti Pro (identity verification)

When you complete the Shufti Pro verification flow, Shufti Pro Ltd. may set cookies on its own domain. These cookies are strictly necessary to operate the verification session and are placed without consent on the basis of Article 5(3) ePrivacy.

Cookie / Identifier	Provider	Purpose	Duration
verify_session	Shufti Pro Ltd.	Maintains the active verification session.	Session
verify_complete	Shufti Pro Ltd.	Marks successful completion of verification.	Session

Shufti Pro's privacy practices are described at <https://shuftipro.com/privacy-policy/>.

### 8.2 Payment processors

Our payment processors place cookies necessary to operate the payment session and to detect fraud. These cookies are strictly necessary to perform the contract with the User who initiates a payment, and are placed without consent on the basis of Article 5(3) ePrivacy.

Cookie / Identifier	Provider	Purpose	Duration
payment_session	Payment-processor partner	Maintains the secure payment session.	Session
fraud_detection	Payment-processor partner	Stores risk-scoring signals for fraud prevention.	Session

The current list of payment processors used by the Platform, together with links to their privacy policies, is published in the Privacy Policy and may be updated from time to time.

### 8.3 Content delivery network (CDN)

We use a content delivery network to deliver media content quickly. The CDN may set strictly necessary cookies to route requests to the optimal edge server.

Cookie / Identifier	Provider	Purpose	Duration
cdn_node	CDN partner	Selects the optimal edge server for the User's request.	Session
cache_version	CDN partner	Tracks cache version to ensure correct content delivery.	Session

## 9. Local storage and similar technologies

### 9.1 Local storage

Local storage is used to store larger amounts of data on your device than would fit in a cookie, including:

- token-balance caching, to reduce server requests;
- temporary form data, to prevent loss of input on accidental refresh;
- user-interface state, such as collapsed/expanded panels.

Local storage entries that are strictly necessary for the requested functionality are used without consent; entries that go beyond strict necessity (for example analytics-related state) are subject to the same consent rules as the equivalent cookies.

### 9.2 Session storage

Session storage stores data for the duration of a single browser tab session, including navigation history within the Platform, temporary order content, and form drafts. Session-storage entries are deleted automatically when the tab is closed.

### 9.3 Tracking signals

The Platform does not use device fingerprinting for tracking purposes. Where we collect device-related signals (browser type, screen resolution, timezone), this is for security, fraud prevention and accessibility purposes only, on the basis of legitimate interest under Article 6(1)(f) GDPR.

We note that the "Do Not Track" (DNT) browser signal has been deprecated and is no longer supported by major browsers in a meaningful way; we therefore do not rely on DNT signals as a method of withdrawing consent. Consent is managed through the mechanisms in Section 11.

## 10. International data transfers triggered by cookies

Some cookie providers (in particular Google LLC for analytics, and certain payment processors and CDN partners) are established outside the European Economic Area, including in the United States. Where personal data is transferred outside the EEA via these cookies, we rely on one of the following safeguards:

- an adequacy decision of the European Commission under Article 45 GDPR;
- the EU–US Data Privacy Framework (DPF) where the recipient is self-certified, on the basis of the European Commission’s adequacy decision of 10 July 2023;
- Standard Contractual Clauses adopted by the European Commission, with supplementary measures where appropriate.

Detailed information on data transfers is available in the Privacy Policy.

## 11. Managing cookies and withdrawing consent

### 11.1 First-visit cookie banner

When you first visit the Platform, a cookie banner appears giving you the following equally prominent options:

- "Accept all" — enables all cookie categories;
- "Reject all (non-essential)" — enables only strictly necessary cookies;
- "Customize" — lets you enable or disable each category individually (functional, analytics, marketing).

"Reject all" is offered with the same visual prominence as "Accept all", in line with the guidance of the European Data Protection Board and Cypriot supervisory authority.

### 11.2 Modifying or withdrawing consent

You can modify your cookie settings or withdraw your consent at any time, with effect for the future:

- by clicking the "Cookie Settings" link in the Platform footer, available on every page;
- through the "Privacy Settings" menu of your User account;
- through your browser settings, as described in Section 11.3 below.

Withdrawing consent does not affect the lawfulness of processing based on consent before its withdrawal. The cookie banner is automatically re-displayed every twelve (12) months, or sooner if there is a material change to the cookies used.

### 11.3 Browser settings

Most browsers allow you to manage or block cookies entirely:

- Chrome: Settings → Privacy and security → Cookies and other site data;
- Firefox: Settings → Privacy & Security → Cookies and Site Data;
- Safari: Settings → Privacy;
- Edge: Settings → Cookies and site permissions.

Mobile browsers offer equivalent settings within their privacy menus. Browser-level blocking applies across all websites you visit and may interfere with strictly necessary cookies.

## 12. Consequences of refusing cookies

Refusing cookies does not prevent you from accessing public areas of the Platform. The specific consequences of disabling cookie categories are:

- Strictly necessary cookies: cannot be disabled at Platform level (you may block them in the browser, but core features such as login, payment and age verification will not work);
- Functional cookies: personalized settings will not be remembered between sessions;
- Analytics cookies: we will not be able to use your visit data to improve our service;
- Marketing cookies: campaign-attribution data will not be collected; the Platform itself does not show fewer or more advertisements based on this category.

Refusing non-essential cookies does not result in any reduction of access to paid or free content for which the User is otherwise entitled — the Platform does not operate a "cookie wall".

## 13. Protection of minors

The Platform is intended exclusively for adults (persons of at least eighteen (18) years of age, or such higher age as is required by the laws of their place of residence). The Platform applies an age gate at first visit and a Shufti Pro identity-verification process at registration to prevent access by minors. While these controls are designed to be effective, no automated age-verification system can guarantee with absolute certainty that no minor will reach the Platform.

Strictly necessary cookies (including the age-gate cookie) may be placed before age verification is complete, because they are required to operate the age gate itself. If we identify that a User has not reached the applicable age of majority, we delete their account and all associated cookies and personal data, except data that we are required to retain to comply with legal obligations.

## 14. Updates to this Cookie Policy

We may update this Cookie Policy from time to time. In case of significant changes:

- the cookie banner is re-displayed so that you can review your consent;
- registered Users receive an email notification;
- a Platform notification appears upon next login;
- a version history is maintained and earlier versions are available on request to [legal@bootyn.com](mailto:legal@bootyn.com).

## 15. Contact

For questions about this Cookie Policy or about the cookies we use, please contact us:

- Email (data protection / legal): [legal@bootyn.com](mailto:legal@bootyn.com)
- General support: [support@bootyn.com](mailto:support@bootyn.com)
- Postal: SPONDEX LTD — Privacy, Voukourestiou 25, NEPTUNE HOUSE, 1st floor, Flat/Office 11, Zakaki, 3045 Limassol, Cyprus

You also have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus (Iasonos 1, 1082 Nicosia, [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy)) or with the supervisory authority of your habitual residence.

## 16. Governing law

This Cookie Policy is governed by the laws of the Republic of Cyprus, taking into account applicable European Union legislation, and without depriving consumers of the protection afforded by mandatory provisions of the law of their habitual residence.

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