

COOKIE POLICY

SPOOLFINDER.COM

Version effective as of: 24 March 2026

New document introduced: 24 March 2026

This Cookie Policy describes the cookies and similar tracking technologies used by SpoolFinder, how consent is managed, your rights, and how to control cookies in your browser. It applies to all regional versions of the Service (spoolfinder.com, spoolfinder.co.uk, spoolfinder.de, spoolfinder.fr and others).

This Cookie Policy supplements the Privacy Policy available at <https://spoolfinder.com/docs/privacy-policy-en.pdf> and the Terms of Service available at <https://spoolfinder.com/docs/terms-of-service-en.pdf>. Definitions used in this document have the meanings given to them in the Terms of Service.

The Data Controller responsible for cookies and personal data processed in connection with them is Maciej Marczuk pursuing a business activity at ul. Krolewej Marysinki 21/89, 02-954 Warsaw, Poland, NIP: 9512010408 ("Data Controller"). Contact: contact@spoolfinder.com, tel. +48 572 830 747.

1. WHAT ARE COOKIES?

Cookies are small text files placed on your device (computer, smartphone, tablet) by websites you visit. They are widely used to make websites work correctly, remember your preferences, analyse traffic and serve personalised advertising.

Similar technologies include Local Storage, session storage and tracking pixels (web beacons). This Cookie Policy covers all such technologies where they are used in the Service.

Cookies are not harmful to your device or stored data. They do not enable direct access to your personal data unless you choose to share it.

2. TYPES OF COOKIES WE USE

2.1. Strictly necessary (technical) cookies

Strictly necessary cookies are essential for the proper functioning of the Service. They enable core features such as navigation, secure login, session management and settings. Without these cookies, the Service cannot function properly.

Legal basis: Art. 6(1)(b) GDPR (performance of contract / technical necessity) and Art. 5(3) of the ePrivacy Directive -- strictly necessary cookies do not require prior consent.

These cookies cannot be disabled via the Consent Management Platform (CMP). Users may block them via browser settings, but doing so may prevent the Service from functioning correctly.

2.2. Marketing and analytics cookies (consent required)

Marketing and analytics cookies are used only after you have given a free, informed and unambiguous consent via the Consent Management Platform (CMP). They are used to run advertising campaigns in Meta Ads and to measure their effectiveness.

Legal basis: Art. 6(1)(a) GDPR -- your consent. Consent is entirely voluntary. Withholding consent does not prevent you from using the core features of the Service.

3. FULL LIST OF COOKIES USED

3.1. Strictly necessary cookies

Name	Provider	Purpose	Retention	Basis
session_id	SpoolFinder	Maintains the logged-in User's session	Until browser is closed (session)	Strictly necessary
csrf_token	SpoolFinder	Protection against CSRF (Cross-Site Request Forgery) attacks	Until browser is closed (session)	Strictly necessary
cookie_consent	SpoolFinder	Stores the User's CMP consent choice	12 months	Strictly necessary

3.2. Marketing cookies -- Meta Pixel (consent required)

Name	Provider	Purpose	Retention	Basis
_fbp	Meta Platforms Ireland Ltd.	Browser identification for Meta Ads advertising system (Facebook, Instagram)	90 days	User consent
_fbclid	Meta Platforms Ireland Ltd.	Stores Meta ad click parameter (fbclid) -- links a visit to a specific campaign	90 days or session	User consent
fr	Meta Platforms Ireland Ltd.	Delivery of personalised ads and measurement of their effectiveness across the Meta ecosystem	90 days	User consent

3.3. Future tracking tools

SpoolFinder may in the future deploy additional analytics or advertising tools (e.g. Google Analytics, Google Ads). Any new tool requiring consent will be added to this Cookie Policy and to the CMP before it is activated. Users will be informed of changes in accordance with §9 of this Policy.

4. META CONVERSIONS API (CAPI) -- SERVER-SIDE TRACKING

In addition to browser cookies, the Data Controller uses Meta Conversions API (CAPI) -- a server-side interface that transmits event data directly from the server to Meta Platforms Ireland Ltd. CAPI does not set cookies in the User's browser.

In respect of data processed via Meta Pixel (browser-side tracking), the Data Controller and Meta Platforms Ireland Ltd. act as **joint controllers** within the meaning of Art. 26 GDPR. The joint

controller addendum is available at: https://www.facebook.com/legal/controller_addendum. Under this arrangement, Meta is primarily responsible for enabling users to exercise their rights regarding data processed within the Meta ecosystem.

Data transmitted via CAPI: hashed e-mail address (SHA-256 algorithm -- data is irreversibly hashed server-side before transmission), IP address, external identifier (external_id), event type and parameters (e.g. page view, click on a Partner's listing).

Legal basis: Art. 6(1)(a) GDPR -- User's consent via the CMP. CAPI is activated only after marketing cookie consent is given. Withdrawing consent via the CMP deactivates both Meta Pixel and CAPI.

Purpose: measuring the effectiveness of Meta Ads campaigns, supplementing Meta Pixel data in cases where browser cookies are blocked (e.g. Safari ITP, Firefox ETP), and creating advertising audiences (Lookalike Audiences).

5. TRANSFER OF DATA TO THIRD COUNTRIES

Meta Platforms Ireland Ltd. (Ireland, EU) may transfer personal data collected via Meta Pixel and CAPI to Meta Platforms Inc. in the United States of America.

This transfer is made under Standard Contractual Clauses (SCC) approved by the European Commission under Decision 2021/914, constituting an appropriate safeguard within the meaning of Art. 46(2)(c) GDPR.

For UK users, onward transfers by Meta are made under International Data Transfer Agreements (IDTAs) or equivalent UK-approved mechanisms.

Details of Meta's transfer mechanisms:

https://www.facebook.com/legal/EU_data_transfer_addendum. Meta's privacy policy:

<https://www.facebook.com/privacy/policy/>

6. CONSENT MANAGEMENT -- CMP

6.1. How does the CMP work?

On your first visit to the Service, a cookie banner (Consent Management Platform) is displayed, allowing you to freely accept or decline each category of cookies.

CMP principles: (a) consent is entirely voluntary -- declining does not block access to the Service; (b) "Accept all" and "Reject all" buttons are equally visible and accessible; (c) we do not use dark patterns or manipulative design to discourage refusal; (d) your choice is stored for 12 months (cookie_consent); (e) you may change your decision at any time.

6.2. How to withdraw or change consent

You may withdraw or change your consent at any time by clicking the "Cookie settings" or "Manage preferences" icon available in the footer of the Service.

Withdrawal is immediate -- once you click "Save settings", marketing cookies are blocked and Meta Pixel and CAPI stop transmitting data to Meta.

Withdrawal does not affect the lawfulness of processing carried out before withdrawal (Art. 7(3) GDPR).

6.3. Additional opt-out options via Meta

Independently of the CMP, you may manage Meta's ad settings directly in your Facebook/Instagram account: <https://www.facebook.com/adpreferences/> -- this controls ads shown across the Meta ecosystem based on data collected in the Service.

7. MANAGING COOKIES IN YOUR BROWSER

You may manage cookies directly in your browser settings at any time, independently of the CMP. Instructions for the most popular browsers are provided below.

7.1. Google Chrome

Open menu (three dots, top right) -> Settings -> Privacy and security -> Cookies and other site data. You can block third-party cookies, delete all cookies, or manage exceptions for specific sites. Direct link: <chrome://settings/cookies>

7.2. Mozilla Firefox

Open menu (three lines, top right) -> Settings -> Privacy & Security -> Cookies and Site Data. Firefox offers Standard, Strict and Custom protection modes -- Strict mode blocks all tracking cookies. Direct link: <about:preferences#privacy>

7.3. Safari (macOS / iOS)

On macOS: Preferences -> Privacy -> check "Block all cookies" or "Prevent cross-site tracking". On iOS: Settings -> Safari -> Privacy & Security -> Prevent Cross-Site Tracking. Safari applies Intelligent Tracking Prevention (ITP) by default, blocking many tracking cookies.

7.4. Microsoft Edge

Open menu (three dots) -> Settings -> Cookies and site permissions -> Manage and delete cookies and site data. Edge offers three protection levels: Basic, Balanced and Strict. Direct link: <edge://settings/content/cookies>

7.5. Opera / Opera GX

Open Settings (gear icon) -> Advanced -> Privacy and security -> Cookies. You can block third-party or all cookies. Opera GX offers additional privacy tools in the GX Control panel.

NOTE

Note: disabling strictly necessary cookies may prevent the Service from functioning correctly -- login, session management and settings storage may stop working.

8. YOUR RIGHTS

In connection with the processing of personal data via marketing cookies, you have the following rights under the GDPR:

- a) **Right of access** (Art. 15 GDPR) -- you have the right to obtain information about what data is processed and for what purpose.
- b) **Right to erasure** (Art. 17 GDPR) -- you may request deletion of data processed on the basis of consent.
- c) **Right to restriction of processing** (Art. 18 GDPR) -- you may request that processing of your data be restricted.
- d) **Right to withdraw consent** (Art. 7(3) GDPR) -- you may withdraw consent for marketing cookies at any time without affecting the lawfulness of prior processing.
- e) **Right to lodge a complaint** -- you have the right to lodge a complaint with the President of the Polish Personal Data Protection Office (UODO), ul. Stawki 2, 00-193 Warsaw, www.uodo.gov.pl.

8a. ADDITIONAL RIGHTS -- UK USERS

UK USERS

If you are in the United Kingdom, your use of cookies is governed by the **Privacy and Electronic Communications Regulations 2003 (PECR)** in addition to the UK GDPR. PECR requires that strictly necessary cookies may be set without consent, while all other cookies (including marketing and analytics cookies) require your prior, informed consent -- the same standard applied by our CMP. The supervisory authority for both UK GDPR and PECR is the **Information Commissioner's Office (ICO)**, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF -- <https://ico.org.uk>. You have the right to lodge a complaint with the ICO at any time, free of charge.

Transfer of your data from the UK to the Data Controller (Poland) and onward to Meta Platforms Inc. (USA) is made under UK-approved transfer mechanisms (IDTAs or equivalent).

8b. ADDITIONAL RIGHTS -- US USERS (CALIFORNIA & OTHER STATES)

US USERS -- CALIFORNIA & OTHER STATES

If you are a California resident, you may opt out of the "sharing" of personal information for cross-context behavioural advertising (which may include data transmitted via Meta Pixel and CAPI) by: (a) withdrawing consent via the CMP; (b) using the Global Privacy Control (GPC) signal in your browser -- the Service honours GPC signals.

To exercise your CCPA/CPRA rights (access, deletion, correction, opt-out), contact us at contact@spoolfinder.com with subject "California Privacy Request". We respond within 45 days. See also §9 of the Privacy Policy and §13 of the Terms of Service.

Users in other US states with applicable privacy laws (Virginia VCDPA, Colorado CPA, Connecticut CTDPA, Texas TDPESA etc.) may exercise equivalent rights at the same address.

8c. ADDITIONAL RIGHTS -- CANADIAN USERS

CANADIAN USERS

If you are in Canada, processing of your data via cookies is governed by PIPEDA and, for Quebec residents, by Quebec Law 25. PIPEDA requires that consent be "meaningful" -- i.e. informed, voluntary and appropriate to the sensitivity of the information. For marketing and tracking cookies, we obtain **express opt-in consent** before activating any Tracking Tools for Canadian users. Consent is collected via the CMP and may be withdrawn at any time. You also have the right to access and correct your personal information and to lodge a complaint with the OPC or CAI.

To exercise your rights, contact us at contact@spoolfinder.com. You may also lodge a complaint with the Office of the Privacy Commissioner of Canada (OPC) at <https://www.priv.gc.ca> or, for Quebec residents, with the CAI at <https://www.cai.gouv.qc.ca>

To exercise any of the above rights, contact the Data Controller at: **contact@spoolfinder.com**.

9. CHANGES TO THIS COOKIE POLICY

The Data Controller reserves the right to amend this Cookie Policy where: new analytics or advertising tools requiring consent are deployed; applicable law or regulatory guidance changes; significant technical changes are made to the Service.

Users will be informed of any changes via a notice in the Service and -- for registered Users -- by email, at least 15 days before the changes take effect, consistent with the notification period set out in the Terms of Service. Where changes are purely technical or editorial and do not require renewed consent, a shorter notice period may apply, but not less than 7 days.

Using the Service after an updated Cookie Policy takes effect constitutes acknowledgement of its new content. Fresh consent for marketing cookies will be collected via the CMP on the first visit after changes are made.

10. FINAL PROVISIONS

10.1. This Cookie Policy entered into force on 24 March 2026.

10.2. Matters not covered by this Cookie Policy are governed by the Privacy Policy at <https://spoolfinder.com/docs/privacy-policy-en.pdf> and the Terms of Service at <https://spoolfinder.com/docs/terms-of-service-en.pdf>.

10.3. This Cookie Policy is governed by Polish law, without prejudice to mandatory consumer protection provisions applicable in your country of residence.

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