

# KeyCandle

## Cookie Policy

How Corporate Business Consulting Group Limited collects, processes and manages cookies and similar tracking technologies on the KeyCandle platform.

**DATA CONTROLLER**  
Corporate Business Consulting Group Limited

**COMPANY NO.**  
78675544

**CONFIDENTIAL DOCUMENT**  
Confidential Document

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## Table of Contents

- Introduction
- What Are Cookies
- Cookie Duration
- Legal Basis for Cookie Usage
- First-Party vs. Third-Party Cookies
- Types of Cookies We Use
- Strictly Necessary Cookies
- Third-Party Cookies
- Cookie Consent
- Managing Your Cookie Preferences
- Do Not Track Signals
- Your Rights

### 1. Introduction

This Cookie Policy explains how Corporate Business Consulting Group Limited (Company No. 78675544), a Private Company Limited by Shares incorporated in Hong Kong, with registered office at RM 701, UNIT 108, 7/F, TWR B, NEW MANDARIN PLAZA, 14 SCIENCE MUSEUM RD, TSIM SHA TSUI, HONG KONG ("we", "our" or "the Company"), uses cookies and similar tracking technologies when you access or use the KeyCandle platform ("Platform"). This policy should be read in conjunction with our Privacy Policy.

### 2. What Are Cookies

Cookies are small text files placed on your device (computer, tablet, or mobile) by websites you visit. They are widely used to make websites function correctly, provide a better browsing experience, and supply reporting information to site operators. Cookies set by the website operator are called "first-party cookies". Cookies set by parties other than the website operator are called "third-party cookies". Third-party cookies enable features or functionality provided by external services such as analytics, advertising, and embedded content.

### 3. Cookie Duration

Cookies placed on your device can differ in the length of time they remain active. We use two categories based on their duration:

- Session cookies:** These are temporary cookies that expire and are automatically deleted when you close your browser. They are used to maintain your session while you navigate between pages on the Platform, ensuring continuity and security during your visit.
- Persistent cookies:** These cookies remain stored on your device for a defined period (or until you manually delete them). They are used to remember your preferences, recognise returning visitors, and provide a more personalised experience across multiple visits.

### 4. Legal Basis for Cookie Usage

We process data through cookies based on the following legal grounds:

- Your explicit consent for non-essential cookies, obtained through our cookie consent banner when you first visit the Platform
- Our legitimate interest in ensuring the technical functionality and security of the Platform (for strictly necessary cookies)
- The necessity to perform our contractual obligations to you, such as maintaining your authenticated session

### 5. First-Party vs. Third-Party Cookies

Cookies can be classified based on which entity sets them on your device. Understanding the distinction is important for managing your privacy preferences:

- First-party cookies:** These cookies are set directly by KeyCandle (Corporate Business Consulting Group Limited) when you visit our Platform. We use them for essential functionality such as authentication, session management, and storing your language and display preferences.
- Third-party cookies:** These cookies are set by external service providers that we have integrated into the Platform, such as Google Analytics, TradingView, and Cloudflare. These providers may use their cookies to collect usage data, deliver interactive widgets, and provide security and performance optimisation services.

### 6. Types of Cookies We Use

Category	Purpose	Duration
Strictly Necessary	Authentication, session management, and platform security. These cookies are essential for the Platform to function and cannot be disabled.	Session / 30 days
Functional	Store your preferences such as language selection, theme settings, and display options to provide a personalised experience.	1 year
Analytics	Help us understand how visitors interact with the Platform by collecting and reporting information anonymously. This data allows us to improve our services.	Up to 2 years
Performance	Monitor and optimise the performance of the Platform, including page load times, server response times, and error rates.	30 days

### 7. Strictly Necessary Cookies

The following cookies are strictly necessary for the operation of the Platform. They enable core functionality and security features. You cannot opt out of these cookies as the Platform would not function properly without them:

**session\_token** Maintains your authenticated session and keeps you logged in while browsing the Platform

**csrf\_token** Provides protection against Cross-Site Request Forgery (CSRF) attacks, ensuring the integrity of your requests

**auth\_token** Manages authentication state and authorisation tokens for secure access to Platform features

### 8. Third-Party Cookies

We use carefully selected third-party services that may place cookies on your device. Each third-party provider operates under its own privacy and cookie policies:

- Google Analytics (cookies: `_ga`, `_gid`, `_gat`) — used to collect anonymous usage statistics, including page views, session duration, and user demographics. Data is processed by Google LLC.
- TradingView (widget cookies) — used to render interactive price charts and market data visualisations within the Platform. Data is processed by TradingView, Inc.
- Cloudflare (cookies: `__cfuid`, `cf_clearance`) — used for CDN performance optimisation, DDoS protection, and bot detection. Data is processed by Cloudflare, Inc.

### 9. Cookie Consent

We are committed to obtaining and managing your cookie consent in a transparent and compliant manner. Our consent mechanism operates as follows:

- When you first visit the Platform, a cookie consent banner is displayed, allowing you to accept or reject non-essential cookies before they are placed on your device
- You may choose to accept all cookies, reject all non-essential cookies, or customise your preferences by category (functional, analytics, performance)
- You can withdraw or modify your consent at any time through your browser settings or by contacting our Data Protection team
- We maintain records of your consent purposes to demonstrate compliance with applicable data protection regulations, including the GDPR and the Hong Kong PDPO

### 10. Managing Your Cookie Preferences

You have the right to decide whether to accept or reject non-essential cookies. You can exercise your cookie preferences in the following ways:

- Browser settings:** Most modern browsers allow you to view, manage, block, and delete cookies. Please note that if you use different devices or browsers, you will need to configure your settings on each one individually.
- Google Analytics opt-out:** You can prevent Google Analytics from collecting your data by installing the Google Analytics Opt-out Browser Add-on, available at [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).
- Platform settings:** Certain functional preferences, such as language and theme, can be managed directly from your account settings.

**Important:** Disabling or blocking certain cookies may impair the functionality of the Platform. In particular, disabling strictly necessary cookies will prevent you from using core features such as authentication and session management.

### 11. Do Not Track Signals

Some browsers include a "Do Not Track" (DNT) feature that sends a signal to websites indicating that you do not wish to be tracked. At present, there is no universally accepted standard for how organisations should respond to DNT signals. Accordingly, the Platform does not currently respond to DNT signals. However, you can still manage your cookie preferences through the methods described in Section 10 of this policy. We continue to monitor developments in this area and will update our practices if a standardised approach is adopted.

### 12. Your Rights

Depending on your jurisdiction, you may have the following rights in relation to your personal data processed through cookies:

- Request access to the personal data we hold about you
- Withdraw your consent to non-essential cookies at any time
- Request deletion of data collected through cookies
- Object to the processing of your data for analytics purposes
- Lodge a complaint with the relevant data protection authority

## Company Information

**COMPANY NO.**  
78675544

**COMPANY TYPE**  
Private Company Limited by Shares

**JURISDICTION**  
Hong Kong Special Administrative Region

**DATA PROTECTION CONTACT**  
[privacy@keycandle.com](mailto:privacy@keycandle.com)

**REGISTERED OFFICE**

RM 701, UNIT 108, 7/F, TWR B, New Mandarin Plaza, 14 Science Museum Rd, Tsim Sha Tsui, Hong Kong

This Cookie Policy is governed by the laws of the Hong Kong Special Administrative Region, including the Personal Data (Privacy) Ordinance (Cap. 486) ("PDPO"). For users located in the European Economic Area, the General Data Protection Regulation (EU) 2016/679 ("GDPR") also applies to the extent relevant. Any disputes arising from this policy shall be subject to the exclusive jurisdiction of the courts of Hong Kong.