

Spend.Net — Cookies Policy

Effective date: 15 May 2026

This Cookies Policy explains how Widberg Affiliates Limited ("we", "us", "our", or "Spend.Net"), the operator of <https://spend.net> (the "Website") and the Spend.Net platform, uses cookies and similar tracking technologies when you visit our Website or use our services. It should be read together with our Privacy Policy and our Terms and Conditions.

Strictly necessary cookies are placed when you access the Website because they are required for the Website and the Spend.Net platform to function. We do not place any non-essential cookies (including analytics, functionality, and third-party cookies) on your device unless and until you give your consent through our cookie banner or preference centre. Consent is given by an affirmative action — clicking "Accept all" or selecting specific categories — and not by continuing to use the Website. You can withdraw or change your consent at any time using the cookie settings link in the Website footer; withdrawal does not affect the lawfulness of any processing carried out before withdrawal.

1. What are cookies?

Cookies are small text files that are placed on your device (computer, tablet, or mobile phone) when you visit a website. They are widely used to make websites function efficiently, to remember user preferences, to support security, and to provide information to the operator of the site. Similar technologies include local storage, pixel tags, and software development kits (SDKs); references to "cookies" in this policy include those technologies where applicable.

2. Categories of cookies we use

2.1 Strictly necessary cookies

These cookies are essential for the Website and the Spend.Net platform to function. They enable core features such as account login, session management, security, fraud prevention, and load balancing. Without these cookies, services you have requested (for example secure access to your Account) cannot be provided. These cookies do not require your consent.

2.2 Performance and analytics cookies

These cookies collect information about how visitors use the Website — for example, which pages are visited most often, error messages, and how users navigate between pages. The information is used to improve how the Website works. Where required by applicable law, we rely on your consent before placing these cookies.

2.3 Functionality cookies

These cookies allow the Website to remember choices you make (such as your language, region, or other preferences) and provide enhanced, more personalised features. They may be set by us or by third-party providers whose services we have added to our pages.

2.4 Security and fraud-prevention cookies

As part of our customer due diligence and transaction monitoring obligations (see our AML Policy), we use cookies and similar technologies to detect suspicious activity, verify devices, and protect your Account. These cookies are treated as strictly necessary.

2.5 Third-party cookies

We may permit selected third parties to place cookies through the Website — for example identity-verification providers, analytics providers, and customer-support tools. These third parties act as independent controllers or processors of the data they collect through their cookies, and their use of cookies is governed by their own policies. We do not use cookies for behavioural advertising or to build advertising profiles.

3. Examples of cookies and technologies

- Session identifiers used to keep you logged in to your Account.
- CSRF and security tokens used to protect against attacks.
- Device-fingerprinting signals used for fraud prevention and KYC/KYT controls.
- Analytics identifiers used to measure aggregated usage patterns.
- Preference cookies storing language, currency, or UI choices.

The table below summarises the cookies and similar technologies we currently use. A fully up-to-date list, including the specific cookie names, providers, retention periods, and the named third parties involved, is available through the cookie preference centre accessible via the cookie-settings link in the Website footer.

Category	Purpose	Typical retention	Consent required
Strictly necessary	Session management, secure login, CSRF protection, load balancing	Session or up to 12 months	No
Security and fraud prevention	Device fingerprinting, account protection, KYC/KYT signals, sanctions screening support	Up to 13 months	No (legal obligation and legitimate interest)
Functionality	Language, currency, and UI preferences	Up to 13 months	Yes (where required by law)
Performance and analytics	Aggregated usage measurement, error reporting	Up to 13 months	Yes
Third-party (identity)	Operated by identity-verification providers and customer-support	Up to 13 months	Depends on category (strictly

Category	Purpose	Typical retention	Consent required
verification, support)	tools we engage; the named providers are listed in the cookie preference centre		necessary: no; analytics/marketing: yes)

We do not use cookies for behavioural advertising, ad targeting, or to build advertising profiles.

4. Legal basis for using cookies

Where applicable law requires a legal basis (for example, under the EU/UK ePrivacy regime), we rely on:

- Your consent for analytics, functionality, and any non-essential third-party cookies.
- Our legitimate interests, or the necessity of performing a contract with you, for strictly necessary and security cookies.
- Compliance with legal obligations, in particular for fraud prevention and anti-money-laundering controls.

5. How long cookies stay on your device

Cookies may be either:

- "Session cookies", which are deleted automatically when you close your browser; or
- "Persistent cookies", which remain on your device until they expire or you delete them. The retention period of each persistent cookie depends on its purpose and typically does not exceed thirteen (13) months for non-essential cookies.

6. How you can control cookies

6.1 Cookie banner and preference centre

On your first visit to the Website, and again whenever we make material changes to the cookies we use, we present a cookie banner that offers you three equivalent and equally prominent options: "Accept all", "Reject all", and "Customize" (allowing you to choose which categories of non-essential cookies to allow). Non-essential cookies are not placed on your device until you have made an active choice. You can change your preferences at any time through the cookie-settings link in the Website footer, and rejecting non-essential cookies will not prevent you from accessing the Website.

6.2 Browser settings

Most browsers allow you to refuse to accept cookies, to delete cookies that have already been set, and to receive notifications when cookies are placed. The methods for doing so vary from browser to browser and from version to version. You can obtain up-to-date instructions for managing cookies via your browser's help menu.

Please note that disabling certain cookies — in particular strictly necessary cookies — may prevent parts of the Website and the platform from working correctly, including secure login and transaction processing.

6.3 Opting out of analytics

Where we use third-party analytics providers, you can usually opt out via tools provided by those providers, or by withholding consent through our cookie banner.

7. International data transfers

Information collected through cookies may be processed in the Republic of the Marshall Islands or in any country where our service providers operate. Where personal data is transferred from the European Economic Area or the United Kingdom to a country that has not been the subject of an adequacy decision (which, as at the effective date of this Cookies Policy, includes the Republic of the Marshall Islands), we put in place appropriate safeguards under applicable data-protection law, including the European Commission's Standard Contractual Clauses (SCCs), the UK International Data Transfer Agreement or Addendum (as applicable), and supplementary technical and organisational measures where required. You can request a copy of the safeguards in place by contacting privacy@spend.net. Further information is set out in our Privacy Policy.

8. Changes to this Cookies Policy

We may update this Cookies Policy from time to time. The updated version will be indicated by an updated "Effective date" and will be effective as soon as it is accessible. Material changes will be brought to your attention through the Website or by other reasonable means.

9. Contact us

If you have any questions about this Cookies Policy, please contact:

Widberg Affiliates Limited

Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Republic of the Marshall Islands, MH 96960

General enquiries: support@spend.net

Privacy and cookie matters: privacy@spend.net

Website: <https://spend.net>