# ONTOLY COOKIE POLICY

**Version 1.1 — Final — November 2, 2026**

This Cookie Policy explains how 1483124 BC Ltd. dba Ontoly and its affiliates and subsidiaries ("**Ontoly**", "**we**", "**our**" or "**us**") use cookies and similar technologies on our website at www.ontoly.org and on the Ontoly Platform, which includes the Ontoly Portal and the Ontoly Registry.

This Cookie Policy forms part of the Ontoly Program Rules and of the **Ontoly Privacy Statement**, which explains more fully how we handle Personal Information, and should be read together with the Ontoly Platform Terms and Conditions and the Ontoly Acceptable Use Policy. Capitalized terms used but not defined here have the meanings given to them in the Ontoly Platform Terms and Conditions and the Ontoly Privacy Statement.

## What Are Cookies?

A cookie is a small text file that a website places on your computer, tablet or phone when you visit it. Cookies allow a website to recognize your device, remember your choices, keep you signed in, and understand how the site is being used.

We also use a small number of related technologies that work in a similar way, including:

- **local storage**, which allows a site to store information in your browser rather than in a cookie file; and
- **pixels** (also called web beacons or clear GIFs), which are tiny images embedded in a web page or email that tell us whether the page or email was opened. We use pixels only in our own emails, to measure whether a message was delivered and opened. We do not use third-party advertising pixels.

In this Cookie Policy, "cookies" refers to all of these technologies.

## How We Approach Cookies

We use as few cookies as we can. Specifically:

- **We do not use advertising, retargeting or social media tracking cookies or pixels.**
- **We do not use session replay or mouse-tracking technology.** We do not record your screen, your keystrokes or your mouse movements.
- **We do not sell or share the information collected by cookies**, and we do not use it for interest-based or behavioural advertising of our services across other websites.
- **We do not use cookies to build advertising profiles about you** or to make automated decisions that affect your account.
- **We do not use cookies or similar technologies to verify your identity or to collect identity documents.** Identity verification is carried out separately at the point you

Copyright © 2026 Ontoly. All rights reserved.

request an Ontoly Portal account, as described in the Ontoly Privacy Statement and the Know Your Customer (KYC) Policy.

Optional cookies are **not set until you consent to them**. When you first visit our website, a cookie consent popup appears, and no optional cookie is placed or read until you have made a choice. You may accept all optional cookies, reject all of them, or open the preference panel and decide category by category. Strictly necessary cookies are set without consent because the website and the Ontoly Portal cannot operate securely without them; this is permitted under applicable law.

We set strictly necessary cookies because they are essential to provide the service you have asked for. Every other cookie is set only on the basis of your consent, and you may withdraw that consent at any time.

### Categories of Cookies We Use

#### 1. Strictly Necessary Cookies

These cookies are essential for our website and the Ontoly Portal to function. They enable core functions such as signing in, keeping you signed in as you move between pages, protecting your session against cross-site request forgery and other attacks, balancing load across our servers, and remembering your cookie preferences. **You cannot switch these off through our cookie banner**, because the service would not work without them, although you can block them through your browser settings (in which case you will not be able to sign in to the Ontoly Portal).

| Purpose | What it does | Type | Typical duration |
|---|---|---|---|
| Authentication / session | Keeps you signed in to the Ontoly Portal and links your requests to your session | First-party | Session, or up to 30 days where you select “remember me” |
| Security | Protects against cross-site request forgery, session hijacking and automated abuse | First-party | Session |
| Load balancing | Routes your requests to the correct server | First-party | Session |
| Cookie preferences | Remembers the cookie choices you have made so we do not ask again | First-party | Up to 12 months |
| Form security tokens | Set by our website platform, Webflow, so that our contact and newsletter forms submit securely and to protect them from automated abuse | First-party | Session |

#### 2. Analytics Cookies (optional — consent required)

These cookies help us understand how visitors use our website — for example, which pages are most visited, how long people spend on them, and whether anything is returning errors. We use this to fix problems and improve the site. The information is aggregated and is used for our own analysis only.

Copyright © 2026 Ontoly. All rights reserved.

We use **Google Analytics 4**, provided by Google LLC. It sets the following cookies on our website:

| Cookie | What it does | Type | Duration |
|---|---|---|---|
| _ga | Distinguishes one visitor from another so that visits can be counted | First-party | 2 years |
| _ga followed by our property ID | Maintains the analytics session state for our specific property | First-party | 2 years |
| _gid | Distinguishes visitors within a single day | First-party | 24 hours |
| _gat | Limits how often requests are sent to Google Analytics | First-party | 1 minute |

**How we configure Google Analytics.** We have disabled **Google Signals**, advertising personalization and Google Ads linking within our Google Analytics property, and we do not enable Google's data sharing settings. The result is that the information collected is used for our own measurement only and is **not used to build advertising audiences, is not combined with your activity on other websites, and is not shared with Google for advertising purposes.**

Analytics cookies are set only if you accept them. If you decline, or if you send an opt-out preference signal that we are required to honour, we will not set them. You can also install Google's own browser opt-out add-on.

**Cookies We Do Not Use**

For clarity, we do not currently place any of the following on our website or the Ontoly Platform:

- advertising or retargeting cookies from ad networks;
- social media tracking pixels, including Meta/Facebook, LinkedIn, X or TikTok pixels;
- conversion-tracking pixels from advertising platforms;
- session replay, heatmap or mouse-tracking tools;
- cross-device or cross-site identity graphs; or
- data broker or audience segment tags.

If this changes, we will update this Cookie Policy and, where the change is material, obtain your consent before setting the new cookies.

Copyright © 2026 Ontoly. All rights reserved.

## Your Choices

### Our Cookie Consent Popup

When you first visit our website, a cookie consent popup appears before any optional cookie is set. The first layer summarizes what we use cookies for and offers you the choice to accept or to reject optional cookies. **Rejecting is as easy as accepting** — the reject option is presented at the same layer and with the same prominence as the accept option, and neither is pre-selected.

From that first layer you can open **Manage Consent Preferences**, which lists each category of cookie we use, explains what the category does, and lets you consent to each category separately. For each category you can expand the detail to see the individual trackers it covers, including the name, description, type and retention period of each, and the identity of the provider and a link to that provider's privacy policy. From the preference panel you may **Reject All**, **Accept All**, or set each category individually and **Save Preferences**.

The categories are:

- **Essentials** — the strictly necessary cookies described in Section 1 above. These are always active and cannot be switched off through the popup, because the website and the Ontoly Portal cannot operate securely without them.
- **Analytics** — the optional cookies described in Section 2 above, which measure how our website is used. These are off unless you turn them on.

Consenting to one category does not consent you to any other. Until you make a choice, no optional cookie is placed or read, and continuing to browse, scrolling, or closing the popup is not treated as consent.

### Changing Your Mind

You can change or withdraw your cookie consent at any time using the **Cookie Preferences** link in the footer of our website, which reopens the consent popup showing the choices you currently have in force. Withdrawing consent is as easy as giving it. Your new choice takes effect immediately, and we will delete or stop reading optional cookies for which you have withdrawn consent. Withdrawing your consent does not affect the lawfulness of anything we did on the basis of your consent before you withdrew it.

### Our Record of Your Choice

We keep a record of the consent you give through the popup — the categories you accepted or refused, the date and time, and the version of this Cookie Policy in force at that time — so that we can demonstrate the choice you made. That record is used only for that purpose.

Your choice remains in force for **twelve (12) months**, after which the popup appears again so that you can confirm or change it. The popup will also appear again if we introduce a new category of cookie, or if you clear your browser's site data.

### Opt-Out Preference Signals

Copyright © 2026 Ontoly. All rights reserved.

We honour the **Global Privacy Control (GPC)** and other opt-out preference signals that we are required to recognize under applicable law. If your browser or extension sends such a signal, we treat it as an instruction to decline optional cookies, and we apply it without requiring you to interact with our banner.

### Browser Controls

Most browsers let you view, delete and block cookies. The relevant instructions are usually found in the browser's settings or help pages, under “Privacy”, “Cookies” or “Site data”. You can also usually browse in a private or incognito window, which discards cookies when you close it.

Please note that blocking strictly necessary cookies will prevent you from signing in to the Ontoly Portal and will stop parts of our website from working.

### Do Not Track

Some browsers offer a “Do Not Track” setting. There is no consistent industry standard for how sites should respond to it, so we do not respond to Do Not Track signals. We do honour the Global Privacy Control, as described above.

### Third-Party Tools We Link To

Some of the tools we use open in a **separate tab on the provider's own website** rather than being embedded in ours. Because of that, they set **no cookies on ontoly.org**. This currently includes our scheduling tool, **Calendly**. When you follow one of those links you leave our site, and the provider's own cookie and privacy practices apply. We encourage you to read them.

Cookies When You Transact and Pay Our Fees

The Ontoly Portal uses strictly necessary cookies to keep you signed in, to maintain your session while you complete a transaction, to protect against fraudulent and automated activity, and to complete payment of our fees securely. **The price you pay a Building Representative for BERUs is paid directly to that Building Representative away from the Ontoly Portal, and no Ontoly cookie is involved in it.** Where you pay a fee owed to Ontoly, **payment card details are collected directly by our payment processor, Stripe, and are not stored by Ontoly.** Stripe sets its own cookies and similar technologies in the payment fields for fraud prevention and to complete the transaction; those are governed by Stripe's own privacy policy and are strictly necessary to process a payment. If you block them you will not be able to pay our fees online.

Acquiring BERUs requires an activated Ontoly Portal account, so these strictly necessary cookies apply to every buyer. **We do not set analytics or any other optional cookie during payment unless you have already consented to them.**

### Cookies and the Ontoly Portal

The Ontoly Portal is an authenticated service. When you are signed in, we use strictly necessary cookies to maintain your session and to protect your account and the BERUs held in it. These cookies confirm that a session belongs to a signed-in account; they are not used to verify who you are for the purposes of the Know Your Customer (KYC) Policy. We also keep server-side security and audit logs of activity in your account — for example, sign-in

Copyright © 2026 Ontoly. All rights reserved.

times, IP addresses and actions taken — which we retain in accordance with the retention periods set out in the Ontoly Privacy Statement. These logs are a security and audit control, not a marketing tool.

### Information Collected Through Cookies

Information collected through cookies may include your IP address, device and browser type and version, operating system, referring page, pages and files viewed, approximate location derived from your IP address at city or region level, and date and time stamps. Where this information identifies you or can reasonably be associated with you, it is Personal Information and is handled in accordance with the Ontoly Privacy Statement, including the sections on how we share information, international transfers, retention and your rights.

### Changes to This Cookie Policy

We may update this Cookie Policy from time to time to reflect changes in the technologies we use or in applicable law. The version and date at the top show when it was last revised. Where a change is material we will notify Account Holders in accordance with Section 2.5 of the Ontoly Platform Terms and Conditions. Where a change introduces a new category of cookie, we will obtain your consent through the consent popup before setting it.

### Contact Us

If you have questions about this Cookie Policy or about our use of cookies, please contact our Privacy Officer:

| By e-mail: | info+privacy@ontoly.org |
|---|---|
| Address: | Attention: Privacy Officer<br>1483124 BC Ltd. dba Ontoly<br>B3787 Garibaldi Highlands PO<br>Squamish, BC Canada V0N 1T0 |

Copyright © 2026 Ontoly. All rights reserved.