COOKIE POLICY

02-09-2026

1. What this policy covers

1.1. This policy explains how **Spiry Ltd** (registration number HE 479622) uses cookies and similar technologies on our websites and on the Spiry platform at app.spiry.com.

1.2. It sits alongside our Privacy Policy, which explains more broadly how we handle personal data.

1.3. "Cookies and similar technologies" means small files placed on your device, and comparable methods of storing or reading information on it — including local storage and pixels used by the services listed below.

2. The categories we use

Category	***What it does***	***Consent needed***
Strictly necessary	Keeps you signed in, secures your session, balances load, remembers your cookie choices, and helps protect against fraud and abuse. The service cannot be provided without these	No — these are exempt from consent because they are essential to providing the service you asked for. Our Privacy Policy explains the legal basis on which we process the underlying data
Functional	Remembers preferences such as language and interface settings	Yes
Analytics and performance	Helps us understand how the product and website are used, and detect errors and crashes	Yes

2.1. Nothing other than strictly necessary technologies is set or read on your device until you have given consent.

3. The services we use

Service	***Category***	***What it is used for***
Our own cookies	Strictly necessary, functional	Sign-in, session security, saving your cookie choices, interface preferences
PostHog	Analytics and performance	Understanding how the Platform is used and diagnosing errors. PostHog may store an identifier in your browser, as a cookie or in local storage, and records page views, clicks and error events

3.1. **Session recording.** PostHog can record how a page or feature was used, including clicks, navigation and page content, so that we can reproduce errors and improve usability. Text entered into fields we mark as sensitive is masked before a recording leaves your browser. Recording only takes place if you consent to analytics and performance technologies.

3.2. These services are provided by third parties who handle the information they receive under their own terms and privacy notices. Depending on the service, they may act as our processors or as independent controllers.

4. Your choices

4.1. **When you first visit us**, you can accept or decline each category other than strictly necessary. Declining does not affect your access to the service, although some preferences may not be remembered between visits.

4.2. **You can change your mind at any time** through the cookie settings, available from the website footer or, where applicable, from the Platform settings. Withdrawing consent is as easy as giving it, and takes effect for the future.

4.3. **How long your choice lasts.** We keep your cookie choices for twelve (12) months and then ask again. You can change them before that at any time.

4.4. **Choices are per browser and per device.** Because your preferences are stored on the device you are using, you will need to set them again on another browser or device, or after clearing your browser data.

4.5. **Your browser also gives you control.** You can block or delete cookies in your browser settings — see the instructions for Chrome, Safari, Firefox and Edge. Blocking strictly necessary cookies will stop parts of the service from working.

5. Do Not Track

5.1. Browsers may send a "Do Not Track" signal. There is no common industry standard for how it should be interpreted, and we do not currently respond to it. Use the cookie settings described in section 4 instead — they apply regardless of any browser signal.

6. Changes

6.1. We may update this policy when our tools change or the law requires it. The current version is always published with its effective date, and material changes are notified in the same way as changes to our Privacy Policy.

7. Contact

For any question relating to this policy, including requests and complaints, write to support@spiry.com. Our identity and registered address are set out in clause 1.1.