Cookie Policy

1. Purpose

This Cookie Policy explains how **DMSX Token LLC** ("**DomusX**," "**we**," "**our**," or "**us**") uses cookies and similar tracking technologies on **domus-x.io** and any investor-related subdomains (collectively, the "**Website**").

It describes what cookies are, which types we use, how we use them, and how you can manage your cookie preferences in compliance with applicable privacy laws.

2. What Are Cookies

Cookies are small text files placed on your device when you visit a website. They help remember preferences, enable certain functionality, enhance performance, and provide analytics about user activity.

Cookies may be:

- **First-party cookies** — set by the Website you are visiting (domus-x.io).
- **Third-party cookies** — set by other websites or services integrated into ours (e.g., analytics, KYC, or cloud CDNs).

Some cookies are **session cookies**, deleted when you close your browser; others are **persistent cookies**, remaining on your device for a defined period or until manually deleted.

3. Why We Use Cookies

We use cookies and similar technologies to:

1. enable secure login and platform navigation;
2. perform KYC/AML verification flows through embedded third-party systems;
3. remember user preferences (language, time zone, display settings);
4. analyse Website traffic and improve usability;
5. prevent fraud, maintain session integrity, and enhance cybersecurity;
6. comply with applicable legal and regulatory obligations, including audit trails;
7. optionally provide anonymised metrics for product improvement.

We do **not** use cookies to sell personal data or conduct behavioural advertising without consent.

4. Types of Cookies We Use

(a) Strictly Necessary Cookies

These cookies are essential for Website functionality and security. They enable account login, KYC sessions, token-subscription forms, and secure communications.
Examples:

- Session identifiers (auth tokens)
- CSRF (Cross-Site Request Forgery) protection tokens
- Payment gateway cookies
  Duration: session-only
  Consent required: No (legitimate interest/legal necessity)

(b) Performance and Analytics Cookies

Used to understand how visitors interact with the Website, measure traffic, and identify usage trends.
Examples:

- Google Analytics (_ga, _gid)
- Server performance logs
  Duration: 1–24 months
  Consent required: Yes, unless aggregated/anonymized
  Opt-out: You can opt out through your cookie settings or [Google's opt-out add-on](#).

(c) Functional Cookies

Enable enhanced functionality and personalization, such as remembering investor login states or language preferences.
Examples:

- Language selection cookie
- "Remember Me" authentication cookie
  Duration: up to 12 months
  Consent required: Yes (non-essential)

(d) Security and Compliance Cookies

Used to prevent fraudulent activities, track compliance actions, and assist in regulatory logging.
Examples:

- KYC/AML process tokens

- Browser fingerprinting for security verification
Duration: 5 years (for audit trails)
Consent required: No (legal obligation)

(e) Third-Party Service Cookies

Placed by integrated partners providing analytics, hosting, or ID verification services. These providers may process your IP address and usage data subject to their own privacy policies.
Examples:

- Cloudflare CDN (_cf_bm)
- Sumsub / Jumio (for identity verification session tracking)
Consent required: Yes, except where necessary for compliance or performance.

5. Third-Party Processors and Links

Our third-party vendors may use cookies or similar technologies to perform analytics or verification services.
Each third party acts as an **independent controller** of its data under its own privacy policy. We encourage users to review:

- [Google Privacy Policy](#)
- [Cloudflare Privacy Policy](#)
- [Sumsub Privacy Policy](#)

6. Consent Management

6.1 Upon your first visit, the Website presents a **cookie consent banner** allowing you to accept all, reject non-essential cookies, or manage detailed preferences.

6.2 You may update preferences at any time via the "Cookie Settings" link in the Website footer.

6.3 For EEA/UK visitors, consent is obtained before any non-essential cookies are placed (GDPR Art. 6(1)(a)).

6.4 For U.S. visitors in applicable states (CA, CO, CT, VA, UT), we honor "Do Not Sell/Share" or "Global Privacy Control" (GPC) signals.

7. How to Control Cookies

You can:

- use our in-site cookie preferences tool;
- configure your browser to block or delete cookies;
- install browser add-ons that manage or block trackers;

- opt out of analytics cookies using the tools referenced above.

Disabling essential cookies may affect Website performance or investor-portal functionality.

8. Legal Basis for Using Cookies

Our use of cookies relies on the following legal bases:

- **Legitimate Interest:** strictly necessary and security cookies.
- **Consent:** analytics, preference, and third-party cookies.
- **Legal Obligation:** compliance and audit-related cookies (BSA/AML, SEC, or tax recordkeeping).

9. Data Collected Through Cookies

Cookies may collect:

- IP addresses, device type, operating system;
- login timestamps and authentication tokens;
- Website usage metrics;
- geolocation or region (non-precise);
- user-selected preferences.

Such information is processed in accordance with our **Privacy Policy** and never used to profile individual investors for marketing purposes.

10. Retention and Expiry

Cookie durations vary by category and purpose. Most expire automatically between the end of a session and 24 months.
You can manually delete them earlier via your browser settings.
Compliance and audit cookies may be retained longer as legally required.

11. Blockchain and Technical Logs

Blockchain transactions may create immutable public records linking wallet addresses with activity timestamps. These are not cookies but functionally similar logs used to verify transaction integrity.
DomusX does not control blockchain storage or deletion; such data are public by design.

12. Changes to This Cookie Policy

We may revise this Cookie Policy periodically to reflect technological or legal developments.
Updates will appear on this page with a new **"Effective Date."**
Material changes will be notified to registered investors via email or in-site notice.

13. Contact Information

Questions or concerns about this Cookie Policy or your cookie preferences can be directed to:

Privacy Officer – DMSX Token LLC
8 The Green, STE B, 19901 Dover, Delaware, USA
Email: **legal@domus-x.io**