

# Cookie Policy

## 1. Introduction

This Cookie Policy explains how **ATWELL** ("we", "our", or "us") uses cookies and similar technologies on our website **[atwell.lu]** (the "Website"). By visiting our website, you consent to the use of cookies in accordance with this policy. If you do not agree with our use of cookies, you should modify your browser settings or stop using the Website.

## 2. What Are Cookies?

Cookies are small text files that are placed on your device (computer, tablet, smartphone) when you visit a website. Cookies allow websites to recognize your device and store information about your preferences or past actions to improve your browsing experience.

## 3. Types of Cookies We Use

We use the following categories of cookies on our website:

- **Essential Cookies:** These cookies are necessary for the operation of the Website and cannot be disabled in our systems. They enable basic functions such as page navigation and access to secure areas of the Website. Without these cookies, some parts of the Website may not work properly.
  - Example: Session cookies, authentication cookies.
  - Legal Basis: Art. 6(1)(b) GDPR (Contractual necessity).
- **Performance Cookies:** These cookies collect information about how visitors use our website, such as which pages are most frequently visited and if users encounter any error messages. These cookies help us improve the functionality of the Website.
  - Example: Google Analytics cookies.
  - Legal Basis: Art. 6(1)(f) GDPR (Legitimate interests – improving website performance).
- **Functional Cookies:** These cookies allow our website to remember your preferences, such as language or region, and provide enhanced features. They improve your user experience by making your visit more personalized.

- Example: Language selection cookies, custom preferences.
- Legal Basis: Art. 6(1)(a) GDPR (Consent).

## 4. Managing Your Cookie Preferences

When you first visit our website, you will be presented with a cookie banner that allows you to accept or reject non-essential cookies (Performance, Functional).

If you want to disable or block cookies, you can do so by adjusting the settings on your browser. Please note that blocking or deleting cookies may affect the functionality of the Website.

## 5. Third-Party Cookies

We may allow trusted third parties to place cookies on your device to collect information for the purposes outlined above, such as improving our services or delivering targeted advertising. These third parties are responsible for their own cookie policies and practices, and we recommend reviewing their privacy policies for more information.

Some third-party cookies we may use include:

- **Google Analytics:** Used to collect anonymous data about website usage and help us improve the performance of our website.

## 6. Data Collected by Cookies

The data collected through cookies may include:

- IP address
- Browser type

This data is used solely to improve user experience, analyze website traffic, and ensure compliance with legal or regulatory requirements.

## 7. Retention of Cookies

You can delete or clear cookies from your browser at any time.

## 8. Changes to This Cookie Policy

We may update this Cookie Policy from time to time to reflect changes in our practices or applicable laws. When we do so, we will update the date at the top of the policy. We encourage you to periodically review this Cookie Policy to stay informed about how we use cookies.

## 9. Contact Us

If you have any questions about this Cookie Policy, or if you need further information on how we use cookies, please contact us at:

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