Cookie Policy

This Cookie policy sets out the basis on which These Modern Times Limited, a private limited liability company registered under the Laws of Malta, bearing company registration number [ ], having its registered office situated at [ ] (hereinafter referred to as the “Company”, “Us”, “We” or “Our”) as a Data Processor, uses cookies on its SurprizeMe application (hereinafter referred to as the “App”).

**What are cookies?**

Cookies are small text files that are placed on the user’s computer or mobile phone when he/she browses websites and/or applications. We use a number of different cookies on our App.

Cookies make your browsing experience better by allowing the App to remember your actions and preferences (such as login and region selection). This means you don’t have to re-enter this information each time you return to the App.

There are primarily two (2) types of cookies: ‘Essential’ cookies or ‘non-essential’ cookies.

**Essential cookies:** these are cookies that are either:

* used solely to carry out or facilitate the transmission of communications over a network; or
* strictly necessary to provide an online service (e.g. Our App or service provided via Our App) which you have requested.

**Non-essential cookies:** these are any cookies that do not fall within the definition of essential cookies, such as cookies used to analyze the users’ behaviour on an application (‘analytical’ cookies) or cookies used to display advertisements to the users (‘advertising’ cookies).

These two (2) types of cookies have different characteristics that can be distinguished and classified according to the length of time for which they are valid and the origin of their placement.

**Cookies according to length of time for which they are valid on the user’s computer may be:**

* **Persistent or permanent cookies**: remain after the session is closed. They are kept on the user’s hard drive until they expire (persistent cookies are designed with an expiry date) or until the user deletes the cookies. Persistent cookies are used to collect identification data relating to the user, such as their behaviour while surfing the internet or their preferences while navigating the App;
* **Session cookies**: only last for the time taken to visit the App (one session). They are deleted when the user closes the browser.

**What cookies do we use and why?**

Some cookies are necessary to allow you to navigate Our App, use its features, and access secure areas. The use of these cookies is essential for the website to work.

We also use functional cookies to remember choices you have made or information you’ve provided, such as your username, language, or the region you are in. These cookies also help save you having to login every time you visit Our App. Moreover, this allows Us to tailor your App experience specifically to your preferences. The functional cookies we use include:

*[Kindly* ***list*** *and* ***explain the function*** *of the types of functional cookies (e.g. session cookies, authentication cookies, security cookies, preferences cookies, load balancing cookies, multimedia player cookies, shopping cart cookies, form cookies, location cookies, notification cookies, user interface customization cookies) that are used for the App to function.]*

We use reporting and analytical cookies to collect information about how you use Our App and how often. These cookies only gather information for statistical purposes and only use pseudonymous cookie identifiers that do not directly identify you. The performance cookies we use include:

*[Kindly* ***list*** *and* ***explain the function*** *of the types of performance cookies (e.g. first-party analytics cookies, third party analytics cookies such as Google Analytics cookies, advertising cookies, social and content cookies) that are used to enhance the user’s experience.]*

**Anonymous visitor statistics cookies**

We use cookies to compile visitor statistics such as how many people have visited Our App, what type of technology they are using (e.g. Mac or Windows which helps Us identify when Our App is not working as it should for particular technologies), how long they spend on the App, what page(s) they look at etc. This helps Us to continuously improve Our App. These so-called Analytics programs also tell Us, on an anonymous basis, how users reached Our App (e.g. from a search engine) and whether they have been here before, helping Us to invest more in developing Our App for the user.

For the aforementioned purposes, We use \_\_\_\_\_\_\_\_\_\_.

**Granting Us permission to use cookies**

The first time you access Our App, as the user, you will be requested to actively accept cookies. If the settings on the user’s software (that he/she is using to view Our App) are adjusted to accept cookies, We consider this, and the user’s continued use of Our App, to mean that he/she agrees that We use cookies. Should the user wish to remove or not use cookies from Our App, he/she may learn how to do this below.

**How to control cookies?**

You can control and manage cookies in various ways. Please keep in mind that removing or blocking cookies can negatively impact your user experience and parts of our App may no longer be fully accessible.

Most browsers automatically accept cookies, but you can choose whether or not to accept cookies through your browser controls, often found in your browser’s “Tools” or “Preferences” menu.

It may be that the user’s concerns with respect to cookies relate to “spyware”. Rather than switching off cookies in the browser, one may find that anti-spyware software achieves the same objective by automatically deleting cookies which are considered to be invasive.