

Cookie Policy – NEOPASS Platform

Effective Date: June 1, 2025

Introduction

NEO Pass Group LLC-FZ (“NEOPASS”, “we”, “our”, or “us”), located at Meydan Grandstand, 6th Floor, Meydan Road, Nad Al Sheba, Dubai, UAE, operates the NEOPASS platform (the “Platform”). This Cookie Policy explains how we use cookies and similar technologies on our Platform, in compliance with applicable laws, including the UAE Federal Decree-Law No. 45 of 2021 (PDPL), the General Data Protection Regulation (GDPR) and ePrivacy Directive (EU/UK), and the California Consumer Privacy Act as amended by the CPRA.

By accessing or using our Platform, you explicitly acknowledge that you have read and understood this Cookie Policy, and you consent to our use of cookies and similar technologies as described, subject to obtaining your explicit consent where required by applicable laws (such as GDPR, UAE PDPL, and CPRA). If you do not agree with our cookie practices, please discontinue use of our Platform or manage your cookie preferences as described below.

1. What Are Cookies?

Cookies are small text files stored on your device (computer, smartphone, tablet, etc.) by the websites and applications you visit. They are used to facilitate the functioning of websites, to remember your preferences, to enhance your user experience, and to analyze site usage. We also use similar tracking technologies (such as web beacons, tracking pixels, local storage, and device fingerprinting) that serve similar purposes as cookies. These technologies are collectively referred to as ‘cookies’ in this Policy.

2. Types of Cookies We Use

We use different categories of cookies:

- **Essential Cookies:** These cookies are strictly necessary to enable essential features of our Platform, such as maintaining your login session, securing transactions, ensuring platform stability, and remembering your privacy preferences. They cannot be disabled without significantly impacting the functionality and security of the Platform. These cookies do not store any personally identifiable information used for marketing purposes.
- **Performance and Analytics Cookies:** These cookies collect information about how users interact with our Platform (e.g., pages visited, duration of visits, and interactions). We use this data to improve our services, optimize the user experience, and better understand our audience. These cookies are not essential and will be activated only after you have provided explicit consent.
- **Functionality Cookies:** These cookies allow our Platform to remember your personal settings and preferences (such as login details, preferred language, display settings). They enhance your browsing experience by providing personalized features. They are activated only with your explicit consent, which you can manage or withdraw at any time.
- **Marketing Cookies:** These cookies track your browsing behavior and collect information about your interests and activities on our Platform. They are used to deliver personalized and targeted advertising, measure marketing effectiveness, and limit the frequency of ads displayed to you. Marketing cookies will only be placed after you explicitly consent. You can withdraw your consent and opt-out of these cookies at any time.

- **Managing Your Cookie Preferences:** You can easily manage your consent preferences for each category of cookies using the dedicated cookie settings tool accessible via the cookie consent banner on our Platform. You can adjust these preferences at any time by clicking on the “Cookie Settings” link available in the footer of our website

3. Third-Party Cookies

We may use third-party services (such as Google Analytics for website analytics, social media platforms for sharing content and social features, and advertising networks to deliver targeted ads) which may place their own cookies and similar tracking technologies on your device. These cookies allow these third parties to collect information about your browsing activities across different websites, enabling them to provide measurement and targeted advertising services. These third-party cookies are governed by the third-party providers’ respective privacy and cookie policies. We encourage you to review the privacy policies and cookie notices of these third-party services directly on their websites for further information about their data practices and to exercise your privacy rights directly with them. NEOPASS does not control or assume responsibility for third-party cookies or the subsequent processing of your personal data by these third-party providers.

Please note that third-party providers placing cookies may transfer your personal data outside your jurisdiction, including countries outside the UAE, the EU/UK, or your home country. For instance, cookies set by Google Analytics may transfer data to servers located in the United States. NEOPASS ensures that appropriate safeguards, such as Standard Contractual Clauses approved by the European Commission or other legally approved mechanisms, are in place for such international data transfers, in compliance with applicable data protection laws (GDPR, UAE PDPL, CPRA)

4. Managing Cookies

You can manage your cookie preferences using our dedicated cookie management tool accessible via the cookie banner displayed when you first visit our Platform, or by clicking the “Cookie Settings” link available in the footer of our website. Additionally, you can manage cookies through your web browser settings. You can accept, reject, or delete cookies. However, please be aware that disabling essential cookies may significantly impact core functionalities such as logging in, security, or platform navigation. In contrast, disabling non-essential cookies (such as analytics or marketing cookies) will not prevent you from accessing basic platform functions, though certain personalized features or content may no longer be available.

- **Browser settings:** Most browsers allow you to manage cookie settings. Visit your browser’s help menu for instructions.
- **Opt-out Tools for Third-Party Cookies:** Some third-party cookie providers (such as analytics platforms and advertising networks) offer dedicated opt-out tools that allow you to directly disable their cookies. Please consult the respective privacy policies or cookie notices of these third-party providers for details about their opt-out mechanisms and further information on their data practices. NEOPASS does not manage or control these third-party opt-out tools.
- **California Residents – Do Not Sell or Share:** If you are a California resident, you have the explicit right under the California Consumer Privacy Act (CPRA) to opt out of the sale or sharing of your personal data collected through cookies used for targeted advertising. You can exercise this right directly by clicking the “Do Not Sell or Share My Personal Information” link provided in the footer of our Platform.
- **Withdrawal of Cookie Consent:** You can withdraw your consent for the use of non-essential cookies at any time through our cookie management tool or your browser settings. Withdrawal

of consent will prevent future cookies from being placed on your device but does not affect the lawfulness of any processing carried out prior to consent withdrawal.

For detailed and specific information on the exact duration of each cookie used on our Platform, please consult our comprehensive **Cookie List**, accessible through the cookie consent banner or via the “Cookie Settings” link located in the footer of our Platform.

You can delete persistent cookies stored on your device at any time through your browser settings or using our dedicated cookie management tool. Detailed instructions for managing or deleting cookies via your browser settings can typically be found in your browser’s help menu. Please note that deleting cookies may affect your experience and require you to re-enter preferences or login credentials upon your next visit.

When persistent cookies reach their expiration date, we will request your explicit consent again if required by applicable law before placing new cookies of the same type on your device. You retain full control over these cookies through your consent choices

5. Cookie Duration

Cookies may be session-based (temporary, deleted when you close your browser) or persistent (remain on your device until expiration or deletion). The duration of persistent cookies varies according to their specific purpose and functionality. Typically, persistent cookies remain active for periods clearly defined at the time of their placement (such as several days, months, or up to a maximum duration of two years, in accordance with best practices recommended by privacy authorities and applicable data protection regulations such as GDPR, UAE PDPL, and CPRA). Specific details about each cookie’s exact duration, including their category, purpose, and expiration periods, are clearly provided in our comprehensive **Cookie List**, accessible directly through our cookie consent banner and via the “Cookie Settings” link in the footer of our website.

Upon expiration of persistent cookies, we will explicitly request your consent again, where required by applicable laws (such as GDPR, PDPL, and CPRA), before placing new cookies of the same type on your device. You retain full control and can manage or withdraw your consent at any time using our cookie management tool.

You can proactively delete persistent cookies stored on your device at any time using your browser settings or our dedicated cookie management tool. Instructions for managing or deleting cookies through your browser can typically be found within the browser’s help section. Please be aware that deleting cookies might affect certain personalized features, requiring you to re-enter your preferences or login details during your next visit.

6. Changes to This Policy

We will explicitly notify you of any significant or material changes at least thirty (30) days before they take effect, either via an email sent to your registered email address or through a clear and prominent notice displayed on our Platform.

If updates to this Cookie Policy introduce new categories of cookies or new purposes of processing your personal data through cookies that require explicit consent under applicable laws (such as GDPR, UAE PDPL, or CPRA), we will request your explicit consent again prior to implementing these changes. If you do not consent, the new cookies or tracking methods will not be activated on your device.

We encourage you to regularly review this Cookie Policy to remain informed about how we use cookies and your rights regarding them. Your continued use of our Platform after the updated policy comes into effect indicates your explicit acknowledgment and acceptance of the updated terms. If

you disagree with the updated Cookie Policy, please discontinue your use of the Platform or adjust your cookie preferences accordingly.

The latest update date of this Cookie Policy is clearly indicated at the top of the document ("Effective Date"). Please always refer to this date to verify that you are reviewing the latest version

7. Contact Information

If you have any questions, concerns, requests, or complaints related to our use of cookies, tracking technologies, or this Cookie Policy, please contact our Data Protection Officer (DPO) using the details provided below:

Email: privacy@neopass.club

Address: NEO Pass Group LLC-FZ, Meydan Grandstand, 6th Floor, Meydan Road, Nad Al Sheba, Dubai, UAE.

EU/UK Representative: If you are located within the European Union or the United Kingdom, you may also contact our GDPR Representative appointed pursuant to Article 27 of the GDPR and UK GDPR for data protection-related inquiries:

Representative:

Address:

Email:

Verification of Identity: To ensure the protection and security of your personal data, we may require additional information from you to verify your identity before responding to your requests or inquiries related to your personal data or cookie usage.

Right to Lodge a Complaint: If you believe that your privacy rights or cookie-related choices have been violated or if you are unsatisfied with our handling of your requests, you have the explicit right to lodge a complaint with the relevant supervisory authority in your jurisdiction, such as your local Data Protection Authority under GDPR, the UAE Data Office under PDPL, or the California Privacy Protection Agency (CPPA) under CPRA

Thank you for trusting NEOPASS with your online experience. We are fully committed to protecting your personal data and privacy in strict accordance with applicable data protection laws and best practices.