# STARBUCKS PRIVACY STATEMENT

At Starbucks, we approach data and privacy as we approach everything we do: we put people first. We believe that taking care of you includes taking care of your data and privacy. Grab a cup of coffee and learn more below.

Last Revised: February 6, 2024

#### Overview

This Starbucks Privacy Statement describes the types of personal data that we collect, how we use it, how and when it is shared, and the choices and rights you have with respect to your data. It also explains how we communicate with you and how you can make requests or submit inquiries to us about your data. Thank you for taking the time to read and understand our data and privacy related practices.

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# 1. Applicability and Scope

This Privacy Statement ("Statement") applies to the website located at https://www.starbucksromania.ro ("Website") and the Starbucks web application available https://www.starbucks.ro/ro/account/login ("web app"), Starbucks Romania mobile application ("mobile app") (web app and mobile app together as "Applications") operated by Starbucks EMEA Limited ("Starbucks EMEA") and, It also applies to the personal

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data processed when you visit a Starbucks store in Romania ("Stores"), all of which are operated by AmRest Coffee S.R.L., with registered office at 46 Grigore Cobalcescu 2nd floor, 1st District, Bucharest, Romania. Tax ID: CUI 20119287 ("AmRest").

Starbucks EMEA is the controller in relation to data collected on the Website and Applications. For specified processing activities, AmRest acts as a separate controller or acts together with Starbucks EMEA as a joint controller. The details of the processing activities and information about controller for each processing activity are described below and in the **Appendix to the Starbucks Privacy Statement**.

In this Statement, the terms "we," "our," or "us" generally refers to Starbucks EMEA. In some cases it refers only to the controller of the data.

## 2. <u>Updates to this Privacy Statement</u>

This Statement went into effect on the "Last Revised" date noted near the top of this page. This Statement may be updated from time to time. When this is the case, you will be notified of any modifications to this Statement that might materially affect your rights or the way that we use or disclose your personal data prior to the change becoming effective by means of a message e.g., on the Website or the Applications. We encourage you to look for updates and changes to this Statement by checking the "Last Revised" date when you access the Website and Application.

## 3. Data We Collect

As you use the Website and Application or visit a Store, we collect data about you and the services you use. The data we collect falls into three main categories: (1) data you voluntarily provide us; (2) data we collect automatically; and (3) data we collect from other sources.

Some examples of when we collect this data include when you browse or make a purchase with an Application; create a Starbucks account; use the Website or Application to purchase, reload or redeem a Starbucks Card; use the order and pay functionality in the Application; or participate in a survey or promotion.

Here you can find a general description of the data we collect. For detailed information on the purposes of the processing, the categories of personal data that is processed, the legal basis of the processing and responsibilities of the controllers, please refer to the **Appendix to the Starbucks Privacy Statement**.

#### (a) Data You Voluntarily Provide Us

Some data we collect is provided when you use our services, such as when you create an account, add a Stored Value Starbucks Card, or join the Starbucks Rewards loyalty program; pay for products; or submit online forms through the Website or Application.

You may also choose to permit us to access data directly from your device. The term "your device" as used in this Statement refers to any computer, tablet, smart phone or other device you are using to access the Website or to operate the Application. For more information about mobile application permissions, please see the **Starbucks Mobile Application** section below.

You are generally free to provide your personal data and the provision of such data is not necessary to enter into and/or perform a contract, with the exception of Starbucks Card or Starbucks Rewards where the provision is necessary.

## (b) Data We Collect Automatically

Some data is collected automatically by us or by service providers performing business functions at our direction, including when you access the Website, download and use the Application, open emails we send or click certain links within them, or otherwise interact with our services. For example:

**Purchasing Data** – We collect data about your transactions in the Stores, on the Website or via the Application including what products you purchase, how frequently you purchase them, and any Rewards or promotions associated with a purchase.

**Device Usage and Location Data** – On the Website, Starbucks EMEA collects certain data using cookies to enable our systems to recognize your browser or device and to provide our services to you. For more information about cookies and how we use them, please refer to the **Appendix to the Starbucks Privacy Statement** and read the [Cookies Notice].

**CCTV** Data – Closed circuit video surveillance cameras ("CCTV") are installed at some of our Stores to ensure safety of persons, including employees, to protect our property and to ensure secrecy of information disclosure of which could expose AmRest to damage. Further information about CCTV is available in Stores.

#### (c) Data We Collect from Other Sources

Some data we collect is from unaffiliated sources, including in some cases data that is publicly available, provided by or purchased from marketing business partners, or present on social media platforms.

For example, we may collect data you submit to a social network like Facebook, Instagram. We may also collect or license data about you from other companies and organizations, such as data aggregators or event or promotion co-sponsors, including to supplement data that we receive from you. In some cases, we receive data about you from affiliated entities, which we handle in accordance with this Statement. By gathering additional data about you, we can correct inaccurate data, enhance the security of your transactions and help prevent fraud, and give you product recommendations and special offers that are more likely to interest you.

## 4. How We Use Your Data

We use your data for business and commercial purposes, including to provide the products and services you request, to perform customer service functions, for security and fraud prevention, for marketing and promotional purposes, and to perform website and mobile application analytics.

Here you can find general information on the purposes and the legal bases we rely upon to process personal data. For detailed information on the purposes of the processing, the categories of personal data that is processed, the legal basis of the processing and on responsibilities of the controllers, please refer to the **Appendix to the Starbucks Privacy Statement**.

- (a) To Conclude or Perform Our Contract With You. We process certain personal data when you access or use our services, for example, to:
- process your purchases of, or requests for, products and services;
- register and verify user accounts;
- support our loyalty programs, such as Starbucks<sup>®</sup> Rewards;

facilitate the functionality of the Website and Application, including payment-related functionality.

If for any reason you do not provide us with the necessary personal data indicated for us to provide you with using our services, we will not be able to perform the full scope of our contract with you (for example, if you do not provide us with your date of birth, we will not be able to send you a birthday coupon).

**(b)** For our Legitimate Business Purposes. We process certain personal data in our legitimate business interests and in your legitimate interests, for example:

To Communicate With You. We process certain data in order to communicate with you in relation to your accounts, our services, our marketing, and your requests, including to:

- allow users to access and browse the Website;
- communicate with you about orders, purchases, returns, services, accounts, programs, contests, and sweepstakes;
- respond to your customer service inquiries and requests for information;
- send you personalized promotions, content, and special offers;
- communicate with you about our brands, products, events, or other promotional purposes;
- implement your communications preferences, such as sharing data with business partners so that they may email you about their promotions, products and initiatives; and
- provide important product safety information and notice of product recalls.

For Research, Development, and Improvement of Our Services. We want to ensure that the Website, Application, and services are continually improving and expanding so that we meet and exceed your needs and expectations. To do so, we process certain personal data, including to:

- maintain, improve, and analyze our Website, Application, ads, and the products and services we offer;
- detect, prevent, or investigate suspicious activity or fraud.

To Enforce our Terms, Agreements, or Policies. To maintain a safe, secure, and trusted environment for you when you use the Website, Application, and other services, we use your personal data to ensure our terms, policies, and agreements with you and any third parties are enforced.

- **(c) To Comply with Applicable Laws.** We are required to process certain personal data under certain laws and regulations, such as tax laws, as well as to:
- maintain appropriate records for internal administrative purposes as required by applicable law; and
- comply with applicable legal and regulatory obligations such as to provide important product safety information and notice of product recalls), and to respond to lawful governmental requests, as needed.
- (d) With Your Consent. If we have your consent to do so, we will process certain personal data, including to:
- send you personalized promotions and special offers via email and other electronic means; and/or
- to inform you about our brands, products, events, or other promotional purposes.

You can withdraw your consent at any time by modifying your promotional preferences in your Starbucks user account online, or by contacting us as described in the **Contact Us** section below. Withdrawing your consent does not affect the lawfulness of the processing prior to the withdrawal.

We do not currently make decisions based solely on automated processing (automated decision-making), including profiling, which produces legal effects or similarly significantly affects you.

# 5. How We Share Your Data

We share your data as needed to fulfill the purposes described in this Statement and as permitted by applicable law. This may include sharing between Starbucks EMEA and AmRest, among affiliated entities for internal business purposes, sharing with service providers to help perform business functions at our direction, sharing with your consent, sharing for marketing purposes, sharing as part of corporate transactions, and sharing to protect lawful interests.

We share personal data in the following circumstances:

- (a) When We Work Together We share data with subsidiaries and affiliated companies including Starbucks Corporation, for fraud monitoring and services and other business purposes. For example, in some cases, we share personal data to administer our loyalty programs, process orders and requests, and expand and promote our product and service offerings.
- (b) When We Work with Service Providers We share your data with service providers that provide us with support services, such as: credit card processing services; Website and Application hosting and management, the platform for our loyalty card; customer care services (such as assistance with responding to data subject access requests); email and postal delivery; location mapping; product and service delivery; fraud monitoring; analytics services; and conducting academic research. We contractually limit these service providers from retaining, using, or disclosing your personal data for any purpose other than performing agreed upon services for us.
- (c) When We Work on Business Transactions If we become involved with a merger, corporate transaction or another situation involving the transfer of some or all of our business assets, we may share your data with business entities or people involved in the negotiation or transfer.
- (d) When Sharing Helps Us Protect Safety and Lawful Interests We disclose personal data if we believe that the disclosure is required by law or legal process, if we believe that the disclosure is necessary to enforce our agreements or policies, or if we believe that the disclosure will help us protect our rights, property, health or safety or our customers or partners.
- **(e)** When We Work with Marketing Service Providers We share data with marketing service providers to assess, develop and provide you with promotions and special offers that may interest you, administer contests, sweepstakes and events or for other promotional purposes.
- **(f) When You Give Consent** We share data about you with other companies if you give us permission or direct us to share the data.

We also share data in a way that does not directly identify you. For example, in some cases we share data about your use of the Website and Application in a manner that does not identify you, or combine data about the nature or frequency of your transactions with similar data about other people and share the aggregated data for statistical analysis and other business purposes.

## 6. Starbucks Loyalty Program

Starbucks EMEA offers the Starbucks Rewards loyalty program for the customers and allows them joining the program through two channels: website application available at <a href="https://www.starbucks.ro/ro/account/login">https://www.starbucks.ro/ro/account/login</a> and mobile application Starbucks CEE.

## (a) Website Application (web app)

Starbucks EMEA offers the Application for our costumers in two ways. One of those ways is to register Starbucks card by website (web app). For more information please visit https://www.starbucks.ro/ro/account/login.

Use of the web app entails data collection in accordance with the **Data We Collect** section above, and includes ways for you (the "User") to control Application functionality.

**User Data** - Through the use of website:

- name and surname;
- e-mail address;
- Device ID.

This User Data is needed to register your Starbucks Card and participate in the Starbucks Rewards loyalty program.

## (b) Mobile Application (mobile app)

Use of the Application entails data collection in accordance with the **Data We Collect** section above, and includes ways for you (the "User") to control Application functionality, such as location services, and setting push notification and in-app message preferences.

Here you can find general information on the purposes and the legal bases we rely upon to process personal data. For detailed information on the purposes of the processing, the categories of personal data that is processed, the legal basis of the processing and on the responsibilities of the controllers, please refer to the **Appendix to the Starbucks Privacy Statement**.

**User Data -** Through the use of an iOS, Android or other supported hardware device, some functionality of the Application requires the transmission of certain data provided by you, including:

- Name and surname;
- e-mail address;
- data related to a Starbucks stored value card ("Starbucks Card");
- GPS location;
- Device ID.

This User Data is needed in order to use the Starbucks Rewards loyalty program. You have multiple options to securely and conveniently make your purchase, including:

• by using the Application to pay in the same manner as you would pay with a Starbucks Card ("Mobile Payment").

**Location Services** - In order to use certain Application functionality (such as the in-app Store Locator) you must either (a) enable "location services" in the Application; and/or (b) set the permissions in your mobile device to allow communication of this data. More information about adjusting location services on iOS

devices may be found <u>here</u>, and additional information on managing an Android device's location settings may be found <u>here</u>.

If you use such Application functionality, including location services you are transmitting User Data to us and/or our agents, and authorize us and/or its agents, to record, process, and store such User Data as necessary for the Application functionality and for purposes described in the Statement.

## **User Responsibility**

You are solely responsible for maintenance of the confidentiality and security of any User Data which you transmit from or store on a device for purposes of the Application including Mobile Payment and for all transactions and other activities undertaken with any Starbucks Card registered in your name, whether authorized or unauthorized. You agree to immediately notify Starbucks EMEA of any unauthorized transactions associated with the Application including Mobile Payment or any other breach of security. Starbucks EMEA shall not be responsible for any losses arising out of the loss or theft of User Data which you transmit from or store on a device or from unauthorized or fraudulent transactions associated with the Application.

#### **Email Communications, Push Notifications, and In-App Messages**

The Application allows all users to set preferences for receiving promotional email communications, receiving push notifications on your device, and receiving inbox messages. Please note as well that you may opt-out of receiving email communications at any time by adjusting your Starbucks online account settings as described in the **Your Choices and Rights** section below, or by clicking the "unsubscribe" link included within any commercial email we send you.

#### 7. Your Choices and Rights

You have control over your promotional communications preferences, Application functionality, certain cookie settings, and interest-based advertising preferences. You also have certain rights under law.

#### **Promotional Communication Choices**

You can opt out of receiving promotional emails and mailings by informing us of your preference at the time you sign up for a Starbucks account, by modifying your promotional preferences online in your account's profile management section, or by following the "unsubscribe" instructions in the promotional emails we send you. Please note that if you opt out of receiving promotional communications, we may still send you transactional communications, including emails and push notifications about your Starbucks accounts or purchases.

**Mobile Functionality** – As described in the **Starbucks Mobile Application** section above, location services, push notifications, and voice transmissions may be adjusted or disabled within your device settings.

Under certain circumstances, by law you have the right to (legal limitations or exclusions to these rights may apply):

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you.
- Request rectification of the personal data that we hold about you.

- Request erasure of your personal data. This enables you to ask us to delete or remove personal data in certain circumstances (e.g., where there is no good reason for us continuing to process it).
- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you.
- Request the transfer of your personal data to another party (right to data portability), when possible.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party), or where we are processing your personal data for direct marketing purposes.

You can exercise these rights by visiting your user account at https://www.starbucks.ro/ro/account/login, or by contacting us as described in the <u>Contact Us</u> section below and specifying which GDPR privacy right(s) you wish to exercise. We must verify your identity in order to honor your request, which we will respond to within one month.

# 8. How We Protect Your Data

We protect your data using technical, physical, and administrative security measures to reduce the risk of loss, misuse, unauthorized access, disclosure or modification of your data. When you transmit highly sensitive data (such as a credit card number) through the Website or in the Application, we encrypt the transmission of that data using the Secure Sockets Layer (SSL) protocol.

However, no security system is perfect, and due to the inherent nature of the Internet, we cannot guarantee that data, including personal data, is absolutely safe from intrusion or other unauthorized access by others. You are responsible for protecting your password(s) and maintaining the security of your devices.

## 9. Retention and Disposal of Your Data

We store personal data as needed to accomplish the purposes identified in this Statement and to meet legal requirements, including record retention, resolving disputes, and enforcing our agreements. Our retention of your personal data is governed by applicable law. This storage period may extend beyond the term of your relationship with us.

As a general rule, we keep your data for only as long as it is needed to complete the purpose for which it was collected or as required by law. We may need to keep your data for longer than our specified retention periods to honor your requests, including to continue keeping you opted out of marketing emails, or to comply with legal, regulatory, accounting or other obligations. E.g., personal data contained in contracts, communications, and business letters may be subject to statutory retention requirements, which may require retention of up to 6 years. If applicable, any other personal data will in principle be deleted 6 years after the termination of the respective related contractual relationship between you and us, if applicable). For more detailed information regarding the actual storage periods please refer to the **Appendix to the Starbucks Privacy Statement**.

When personal data is no longer needed, or in any event, after legal authority to retain it has expired, personal data will be destroyed, in accordance with local law and pursuant to procedures established in relation to the relevant system or process.

## 10. Children

We do not intend for the Website or online services to be used by children. If you are a parent or guardian and believe we may have collected data about your child, please contact us immediately as described in the "Contact Us" section of this Statement. For more information, please see our Terms of Use.

## 11. International Transfers

Your personal data may be transferred to, stored, and processed in a country other than the one in which it was collected, and outside of the European Economic Area (EEA) including the United States. In such cases, we will take appropriate steps to ensure an adequate level of data protection of the recipient as required under the GDPR, including by putting in place standard contractual clauses that have been approved by the European Commission. You may obtain a copy of these clauses by contacting our Data Protection Officer (see the **Contact Us** section below).

## 12. Contact Us

We welcome your questions, comments and concerns about privacy. You can contact Starbucks EMEA Limited via email at privacy@starbucks.com, or post at Building 7, Chiswick Park, 566 Chiswick High Road, London, UK.

If you have any issues with our compliance, you have the right to lodge a complaint with an EEA supervisory authority (<u>link</u>). We would appreciate the opportunity to first address your concerns and would welcome you directing an inquiry first to us per the **Contact Us** section above. You may also contact the Starbucks EMEA Data Protection Officer ("DPO") at any time at <u>privacy@starbucks.com</u>. You can also contact the DPO of AmRest at *dporomania@amrest.eu regard to the personal data processed when you visit a Starbucks store operated by AmRest*.

# Appendix to the Starbucks Privacy Statement

	Purposes of the Processing	Categories of Personal Data	Legal Basis for the Processing	Controller for the Processing of the Personal Data
1.	Brand website access and browsing  To allow users to access and browse the Website.	IP address date and time of the access request time zone difference to Greenwich Mean Time (GMT) content of the request (specific page) access status/HTTP status code the data volume transferred website from which the access request is made browser (language and version of the browser software) type of device and operating system	Data processing related to the Website is based on legitimate interests (Art. 6 (1) (f) GDPR) (e.g., the processing of personal data your browser transmits to our server is technically required to let you access and browse the Website). More information on the balancing test is available upon request.	Starbucks EMEA
2.	Starbucks Rewards website access and browsing  To allow users to access and browse the Website.	IP address     date and time of the access request     time zone difference to Greenwich Mean Time (GMT)     content of the request (specific page)     access status/HTTP status code     the data volume transferred     website from which the access request is made     browser (language and version of the browser software)     type of device and operating system	Data processing related to the Website is based on legitimate interests (Art. 6 (1) (f) GDPR) (e.g., the processing of personal data your browser transmits to our server is technically required to let you access and browse the Website). More information on the balancing test is available upon request.	Starbucks EMEA

	Purposes of the Processing	Categories of Personal Data	Legal Basis for the Processing	Controller for the Processing of the Personal Data
3.	Starbucks Mobile Application  To allow users to use the functionality of the Application.	<ul> <li>IP address</li> <li>date and time of the access request</li> <li>time zone difference to Greenwich Mean Time (GMT)</li> <li>content of the request (specific page)</li> <li>access status/HTTP status code</li> <li>the data volume transferred</li> <li>type of device and operating system</li> <li>username and password;</li> <li>e-mail address;</li> <li>billing address;</li> <li>phone number;</li> <li>financial data, such as payment confirmation;</li> <li>data related to a Starbucks stored value card ("Starbucks Card");</li> <li>advanced analytics data such as location data, diagnostic and usage data, and user interactions;</li> <li>location-based data, such as through GPS or other location-based technology to enhance the user experience so that you may order ahead, receive directions, and see what is available at nearby Stores; and</li> <li>the day and month of your birthday, so that we may recognize you on your special day (we don't ask for</li> </ul>	Data processing related to the Application is based on legitimate interests (Art. 6 (1) (f) GDPR) (e.g., the processing of personal data your device on which the Application is installed transmits to our server(s) is technically required to let you use the Application). More information on the balancing test is available upon request.	Starbucks EMEA
4.	General Communication	your birth year for this).  • first name	Legitimate interests (Art. 6 (1) (f) GDPR):	Starbucks EMEA
4.	To communicate with users about orders, purchases, accounts, etc. and to respond to customer services inquiries and requests for information.	<ul> <li>Irist name</li> <li>last name</li> <li>address</li> <li>city</li> <li>post code</li> <li>email address</li> <li>plus, for loyalty members of AmRest, data as listed below for Starbucks Rewards</li> </ul>	The processing of personal data is necessary to answer the respective request of the user which otherwise cannot be fulfilled. Therefore, the processing is justified on the basis of legitimate interests. More information on the balancing test is available upon request.	GIGIBUONS LIVILA

	Purposes of the Processing	Categories of Personal Data	Legal Basis for the Processing	Controller for the Processing of the Personal Data
5.	Personalized newsletters and other communication, including personalized promotions, content, and special offers, and communication about our brands, products, events, or other promotional purposes  To allow users to subscribe to our personalized newsletter and provide users with personalized newsletters.	first name last name plus, for loyalty members, data as listed below for Starbucks Rewards  data to personalize marketing communications (e.g., purchase history, including details regarding purchased products, time of the purchase (weekday versus weekends, time passed since the last purchase), favourite location/city, date of birth for birthday communication), demographic data (such as gender, age range, country and inferred interest groups (e.g., "coffee lover" or "interested in	Legitimate interest (Art. 6 (1) (f) GDPR) in connection with the consent for receiving marketing information is the legal basis for the processing of personal data for the purpose of personalizing and sending emails to subscribers of the personalized newsletters about initiatives, announcements and product offers based on account info and activity (profiling).	Joint Controllership
				Starbucks EMEA is responsible for:
				<ul> <li>Collecting, storing, de-identifying (through tokenization, among other things) Customer Personal Data, determining which Customer Personal Data (if any) to share with Licensee, and sharing such Customer Personal Data;</li> </ul>
				Determining any limits on analytics that Licensees may carry out using Customer Personal Data that Starbucks shares to improve marketing campaigns; and
				• Determining the general approach to communications, providing Licensee with recommendations and guidelines about the approach.
		travel")).		AmRest is responsible for:
				<ul> <li>Conducting analytics on Customer Personal Data to improve their marketing communications, in accordance with parameters set by Starbucks; and</li> </ul>
				• Determining the precise content of communications (in accordance with the guidelines), determining the calendar of communications, and the sending of communications to customers, and for determining the calendar of the loyalty promotions newsletter.
6.	Analytical services on Website and Application	More information can be found in the privacy policies of our trusted Partners,	Legitimate interests (Art. 6 (1) (f) GDPR).	Starbucks EMEA
	In order to ensure the security of the service, perform statistical measurements, improve our services and adjust them to the needs and convenience of users.	which can be found at the following link []		
7.	Starbucks Rewards	<ul> <li>first name;</li> <li>last name;</li> <li>email address;</li> <li>password;</li> <li>address;</li> </ul>	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (i.e. contract regarding participation in the Starbucks Rewards program and to provide the benefits under the Starbucks Rewards Program) (Art. 6 (1) (b) GDPR).	Join Controllership
	To allow users to enrol in our customer loyalty and benefit program Starbucks Rewards by registering for it and to offer and improve the Starbucks Rewards program and to improve			Starbucks is responsible for:
				All Processing related to Starbucks Rewards; and

	Purposes of the Processing	Categories of Personal Data	Legal Basis for the Processing	Controller for the Processing of the Personal Data
	our products and services as described in the relevant Terms and Conditions [insert link].	<ul> <li>address 2 (optional);</li> <li>city;</li> <li>post code;</li> <li>birthday (only month and day);</li> <li>Starbucks Card number;</li> <li>browser (language and version of the browser software);</li> <li>type of device and operating system;</li> <li>cardholder data; and transaction records.</li> </ul>		Determining any limits on Processing that Licensees may carry out using Customer Personal Data that Starbucks shares.  AmRest is responsible for:     Conducting analysis on the Customer Personal Data Starbucks shares with it in accordance with any limitations Starbucks imposes;     Managing general performance of the program (e.g., sales, frequency, average ticket, number of customers with marketing consent, in-store versus mobile app usage, active points balance), and related marketing campaign management; and     Measuring marketing campaign effectiveness (e.g., how many customers used the promo, sales generated, return on investment).
8.	Operation of CCTV in retail locations.	Video footage	Legitimate interests (Art. 6 (1) (f) GDPR).  The processing is necessary to ensure safety of persons, including employees, to protect our property and to ensure secrecy of information disclosure of which could expose AmRest to damage.	AmRest

For information about cookies and how we use them on the Website, please read the Cookies Notice.