

# Cookie Policy

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## Introduction

This Cookie Policy explains how Circle Economy Foundation (“Company”, “we”, “us”, or “our”) uses cookies and similar technologies on our website [www.circle-academy.com](http://www.circle-academy.com). It should be read in conjunction with our [Privacy Policy](#). We are committed to transparency and compliance with the **General Data Protection Regulation (GDPR)** and **ePrivacy Directive (2002/58/EC)**, and this policy outlines how we collect, use, and manage cookies and related technologies.

## About us

Circle Economy Foundation

Company registration number: 52051048

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[info@circle-economy.com](mailto:info@circle-economy.com)

Data Protection Officer (**DPO**): Mihail Bashev, [mihail@circle-economy.com](mailto:mihail@circle-economy.com)

## What are cookies?

Cookies are small text files stored on your device (computer, smartphone, tablet) when you visit a website. They are widely used to make websites work efficiently, as well as to provide information to site owners. Cookies can be:

1. **First-party cookies**: set by the website you are visiting
2. **Third-party cookies**: set by domains other than the website you are visiting

## Types of cookies we use

We use different types of cookies for different purposes. Below is a breakdown of the categories:



Cookie Type	Purpose	Examples	Retention
Functional	Improve general performance and functionality of the website.	To allow easy login or remember a user's region.	Depending on the purpose of the types of cookies, it can vary from session only to up to 10 years (depending on browser settings).
Performance	Track website visitors and their user behaviour.	To improve the way the website works and in turn, used to improve user experience.	Depending on the purpose of the types of cookies, it can vary from session only to 13 months.
Marketing	Track user behavior for advertising and social media purposes.	To collect data on interactions, preferences, and habits.	After 7 days data will be made pseudonymous and stored for another 180 days.

## Lawful basis for collecting and processing personal data

We rely on the following legal bases under the GDPR:

1. Consent – for all non-essential cookies (i.e. targeting, advertising, analytics, etc.) we rely on your consent. Consent is collected via the cookie banner
2. Legitimate interest – for strictly necessary cookies needed to deliver website functionality

You may withdraw or modify your consent at any time by adjusting your preferences through our Cookies Script cookies consent manager.

## List of cookies

A complete and up to date list of the cookies we use is available in our Cookie Consent Tool. Here are some examples;

Strictly Necessary cookies				
Cookie key	Domain	Cookie type	Expiration	Description
accessToken	<a href="https://knowledge-hub.circle-economy.com">knowledge-hub.circle-economy.com</a>	First-party	1 day	This is your session cookie - it is only used to keep you signed in
accessToken	.knowledge-hub.circle-economy.com	First-party	1 day	It is used to keep you signed in
sub	.knowledge-hub.circle-economy.com	First-party	10 years	It is used to keep you signed in
refreshToken	.knowledge-hub.circle-economy.com	First-party	1 second	It is used to keep you signed in
CookieScriptConsent More info	.circle-economy.com	Third-party	1 month	This cookie is used by Cookie-Script.com service to remember visitor cookie consent preferences. It is necessary for Cookie-Script.com cookie banner to work properly.
__Secure-ROLLOUT_TOKEN More info	.youtube.com	Third-party	6 months	This cookie is set by YouTube to track views of embedded videos.
Performance cookies				
Cookie key	Domain	Cookie type	Expiration	Description
_ga_DPNN7D5S9Q More info	.circle-economy.com	Third-party	1 year 1 month	This cookie is used by Google Analytics to persist session state.
_ga More info	.circle-economy.com	Third-party	1 year 1 month	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to



				calculate visitor, session and campaign data for the sites analytics reports.
Targeting cookies				
Cookie key	Domain	Cookie type	Expiration	Description
YSC More info	.youtube.com	Third-party	Session	This cookie is set by YouTube to track views of embedded videos.
VISITOR_INFO1_LIVE More info	.youtube.com	Third-party	6 months	This cookie is set by Youtube to keep track of user preferences for Youtube videos embedded in sites;it can also determine whether the website visitor is using the new or old version of the Youtube interface.

You can manage or withdraw cookie consent via our Cookie Consent Banner or through your browser's settings.

## Third-party cookies

Some cookies are set by third-party services embedded in our site. These providers may use cookies to collect information independently. Please consult their respective privacy/cookie policies.

## Cookie consent and control

When you first visit our site, you are presented with a cookie banner requesting your consent for non-essential cookies. You can:

1. **Accept all cookies**
2. **Reject all non-essential cookies**
3. **Customise your preferences**

You may withdraw or modify your consent at any time by adjusting your preferences through our Cookie Consent Manager.

## International data transfer



Some third-party cookies may result in data being transferred outside the European Economic Area (**EEA**). In such cases, we ensure that appropriate safeguards (such as Standard Contractual Clauses) are in place, as described in our [Privacy Policy](#).

## Policy updates

We may update this policy from time to time to reflect changes in law or operations. Any changes will be posted on this page and where appropriate, notified by email

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Previous versions: Available upon request

## Contact

For any questions, concerns or complaints regarding this Privacy Policy, contact our DPO:

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