

COOKIE POLICY

(Safelora – www.safelora.com)

ARTICLE I: INTRODUCTION AND PURPOSE

1.1 Purpose.

This Cookie Policy (the “Policy”) explains how Safelora (“Safelora,” “we,” “us,” or “our”) uses cookies and similar technologies on the Website www.safelora.com (the “Website”).

1.2 Compliance.

This Policy complies with:

- (a) Regulation (EU) 2016/679 (GDPR),
- (b) Spanish Organic Law 3/2018 (LOPDGDD),
- (c) Spanish Law 34/2002 (LSSI-CE), and
- (d) The AEPD Cookie Guide and EDPB Cookie Banner Taskforce report.

ARTICLE II: CONTROLLER IDENTIFICATION

2.1 Identity of Controller.

Safelora
Street 534, Number 20
La Cañada, Paterna, Valencia, Spain
Email: admin@safelora.com

2.2 Contact for Cookie Issues.

All inquiries related to cookies and privacy may be directed to admin@safelora.com

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ARTICLE III: DEFINITIONS

3.1 “Cookies.” Cookies are small text files stored on the User’s device when visiting the Website, used to recognize the User, improve navigation, and enable certain functions.

3.2 “Similar Technologies.” This includes local storage, SDKs, tracking pixels, and scripts that perform similar functions to cookies.

3.3 “First-Party Cookies.” Cookies set directly by Safelora through the Website.

3.4 “Third-Party Cookies.” Cookies set by providers other than Safelora, such as Stripe, PayPal, Tutor LMS, or analytics vendors.

3.5 “Preference Center.” An interactive tool allowing Users to grant, withdraw, or adjust cookie consent by category at any time.

ARTICLE IV: LEGAL BASIS FOR COOKIES

4.1 *Strictly Necessary Cookies.*

These do not require consent and are processed based on legitimate interest in providing core Website functions.

4.2 *Non-Essential Cookies.*

Analytics, advertising, and personalization cookies require explicit consent (GDPR Art. 6(1)(a)).

4.3 *Equal Prominence Rule.*

The cookie banner provides “Accept all,” “Reject all,” and “Customize” buttons with equal prominence, ensuring no dark patterns or deceptive colors.

4.4 *Consent Withdrawal.*

Consent can be withdrawn at any time without affecting prior lawful processing.

ARTICLE V: CATEGORIES OF COOKIES USED

5.1 *Strictly Necessary Cookies.*

Enable core functions (e.g., session management, security, payment processing). Without these, the Website cannot function.

5.2 *Preferences Cookies.*

Store User choices such as language or interface preferences.

5.3 *Analytics Cookies.*

Collect statistical information on User interactions, such as course navigation or time spent. Used only with consent unless exempted under GDPR conditions (aggregated, anonymized).

5.4 *Advertising Cookies.*

Track browsing habits to display relevant ads. Safelora does not prioritize advertising cookies, but reserves the right to deploy them with consent.

5.5 *Third-Party Cookies.*

Issued by payment providers (Stripe, PayPal), LMS integrations, and possibly analytics vendors.

ARTICLE VI: FIRST-LAYER BANNER REQUIREMENTS

6.1 *Equal Options.*

Upon first visit, the banner displays:

- “Accept all”
- “Reject all”
- “Customize”

All are of equal size, prominence, and visibility.

6.2 Default Settings.

Non-essential cookies are disabled by default. No pre-ticked boxes are allowed.

6.3 No Implied Consent.

Continuing to browse or scroll does not imply consent.

6.4 Language and Clarity.

Banner uses plain, simple language accessible to all Users.

ARTICLE VII: SECOND-LAYER PREFERENCE CENTER

7.1 Details Provided.

The second layer provides full details, including:

- (a) Cookie name.
- (b) Provider.
- (c) Purpose.
- (d) Duration (session or persistent).
- (e) Type (first-party or third-party).

7.2 User Toggles.

Users may activate or deactivate each category except strictly necessary cookies.

7.3 Transparency.

Where third-party cookies are used, links to their policies are provided.

ARTICLE VIII: CONSENT MECHANISMS

8.1 Logging of Consent.

Safelora records consent decisions with time stamp, User selections, and country, for accountability purposes.

8.2 Renewal of Consent.

Consent will be re-requested every 6–12 months, or sooner if the cookie set materially changes.

8.3 Withdrawal.

Users can withdraw or modify consent anytime via the “Change cookie preferences” link in the Website footer.

ARTICLE IX: THIRD-PARTY COOKIES AND PROVIDERS

9.1 Payment Providers.

Stripe and PayPal may set cookies for fraud prevention, session tracking, and payment processing. Users are directed to their respective policies.

9.2 Tutor LMS and Plugins.

LMS integrations may use cookies to manage sessions, track progress, and store preferences.

9.3 Analytics Vendors.

Safelora may deploy analytics tools such as Google Analytics or Matomo, subject to consent.

Note: Safelora disclaims liability for third-party cookies beyond its technical control.

ARTICLE X: COOKIE RETENTION PERIODS

10.1 Strictly Necessary Cookies.

Typically expire at session end or within a few months.

10.2 Preferences Cookies.

Retained for 6–12 months, or until User deletes them.

10.3 Analytics Cookies.

Retained for up to 24 months, unless anonymized and aggregated.

10.4 Advertising Cookies.

Retention varies depending on provider, but consent will expire within 12 months unless renewed.

10.5 Audit Date.

Safelora conducts periodic audits of deployed cookies and updates this Policy accordingly.

ARTICLE XI: CONSENT LOGGING AND ACCOUNTABILITY

11.1 Logging Practices.

Safelora maintains internal records of cookie consent decisions to demonstrate compliance with GDPR principles of accountability and transparency. Logs include:

- (a) Date and time of consent or rejection.
- (b) Categories of cookies accepted or rejected.
- (c) Country of origin (based on IP or browser locale, anonymized where possible).
- (d) Version of this Cookie Policy in force at the time.

11.2 Secure Storage.

Consent records are encrypted, stored securely, and segregated from operational systems to prevent unauthorized access.

11.3 Proof of Consent.

Safelora reserves the right to provide evidence of logged consent if requested by supervisory authorities or courts.

Note: Users acknowledge that consent records may be retained beyond cookie expiration where necessary to demonstrate compliance with legal requirements.

ARTICLE XII: CONSENT RENEWAL AND RE-PROMPTING

12.1 Periodic Renewal.

Consent banners will be re-displayed at least every 6–12 months, depending on the sensitivity of cookies used and regulatory expectations.

12.2 Material Changes.

Safelora will re-prompt Users for consent sooner if:

- (a) A new cookie category is introduced.
- (b) A third-party provider changes its policy significantly.
- (c) There is a regulatory requirement to re-obtain consent.

12.3 User Experience.

Re-prompts are designed to be clear, non-intrusive, and aligned with GDPR and AEPD guidance.

ARTICLE XIII: WITHDRAWAL AND MODIFICATION OF CONSENT

13.1 Withdrawal Mechanism.

Users may withdraw or modify consent at any time using:

- (a) The “Change cookie preferences” link in the footer.
- (b) Browser settings to delete cookies.
- (c) Direct request to admin@safelora.com

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13.2 Immediate Effect.

Withdrawal of consent becomes effective immediately, disabling future setting of non-essential cookies.

13.3 Past Data.

Withdrawal does not affect the lawfulness of processing based on consent prior to its withdrawal.

Note: Safelora is not obliged to erase aggregated or anonymized data derived from cookies once collected.

ARTICLE XIV: SPECIAL RULES FOR MINORS

14.1 Digital Age of Consent.

In Spain, the minimum age for valid digital consent is 14 years. Users under 14 must not provide cookie consent without verified parental authorization.

14.2 Safelora Measures.

- (a) Safelora does not knowingly deploy profiling cookies targeted at children under 14.
- (b) If underage consent is detected, Safelora will take reasonable steps to delete associated cookie records.

14.3 User Responsibility.

Parents or guardians remain responsible for monitoring minors' use of the Website and managing cookie settings.

ARTICLE XV: ANALYTICS AND MEASUREMENT TECHNOLOGIES

15.1 Purpose of Analytics.

Analytics cookies are used to measure traffic, performance, and User interactions with course materials, helping Safelora improve functionality.

15.2 Legal Basis.

Analytics cookies are deployed only after obtaining consent, unless exempt under GDPR Recital 26 (strictly anonymized and aggregated).

15.3 Tools.

Safelora may use:

- Google Analytics with IP anonymization and configured retention limits.
- Matomo (self-hosted) for privacy-enhanced analytics, where applicable.

ARTICLE XVI: ADVERTISING AND PROFILING COOKIES

16.1 Use of Advertising Cookies.

Safelora may, in the future, deploy advertising or remarketing cookies to tailor ads. These will only be set with prior consent.

16.2 Third-Party Networks.

Advertising cookies may come from networks such as Google Ads or social media platforms. Users are directed to their policies.

16.3 Opt-Out.

Users may disable advertising cookies at any time via the Preference Center.

Note: Safelora disclaims liability for third-party advertising practices beyond its control.

ARTICLE XVII: RETENTION AND EXPIRATION OF COOKIES

17.1 Retention by Category.

- (a) Strictly necessary – session or short-term (up to 12 months).
- (b) Preferences – 6–12 months.
- (c) Analytics – up to 24 months.
- (d) Advertising – up to 12 months unless renewed.

17.2 User Control.

Users may manually delete cookies at any time through browser settings.

17.3 Periodic Audit.

Safelora performs cookie audits at least once per year and updates this Policy with the date of last review.

ARTICLE XVIII: INTERNATIONAL TRANSFERS

18.1 Third-Party Providers.

Some third-party cookies (e.g., Stripe, PayPal, Google) may involve processing outside the EEA.

18.2 Safeguards.

Transfers are based on:

- (a)** EU adequacy decisions.
- (b)** Standard Contractual Clauses (SCCs).
- (c)** Supplementary safeguards (encryption, minimization).

18.3 User Acknowledgment.

By consenting to third-party cookies, Users acknowledge that some data may be processed in non-EEA jurisdictions with different legal protections.

ARTICLE XIX: LIABILITY AND DISCLAIMERS

19.1 User Responsibility.

Users are responsible for configuring cookie preferences and for deleting cookies if desired.

19.2 Third-Party Cookies.

Safelora does not control third-party cookies and disclaims liability for their practices, subject to mandatory rights.

19.3 Service Limitations.

Rejecting cookies may impact service quality. Safelora shall not be liable for diminished performance resulting from cookie refusal.

Note: Safelora reserves maximum protections permitted under law, limiting liability to mandatory obligations only.

ARTICLE XX: GENERAL

20.1 Governing Law.

This Policy is governed by Spanish law.

20.2 Supervisory Authority.

Users may file complaints with the Agencia Española de Protección de Datos (AEPD) if dissatisfied with Safelora's handling of cookie consent.

20.3 *Updates to this Policy.*

Safelora reserves the right to update this Policy at any time. Significant changes will be announced through banners or preference re-prompts.

20.4 *Last Updated.*

This Cookie Policy was last updated on September 3, 2025.

20.5 *Contact.*

For questions or requests, contact: admin@safelora.com

BY CLICKING “ACCEPT ALL,” ADJUSTING PREFERENCES, OR CONTINUING TO USE SAFELORA’S WEBSITE AFTER ACCEPTING COOKIES, USERS ACKNOWLEDGE THAT THEY HAVE READ AND UNDERSTOOD THIS COOKIE POLICY, AND CONSENT TO COOKIE PRACTICES CONSISTENT WITH THEIR SELECTIONS.