



COOKIE POLICY

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COOKIE POLICY

Please read this Cookie Policy carefully. It explains how Intesa Sanpaolo Wealth Management S.A. (**ISPWM**) use cookies and/or similar technologies on the platform FIDEURAM DIRECT (the **Platform**).

This Cookie Policy should be read together with ISPWM Platform Privacy Notice which sets out how and why ISPWM collects, stores, uses and shares Personal Data generally, as well as your rights in relation to your Personal Data and details on how to contact ISPWM and supervisory authorities in the event you have a complaint.

1. ISPWM'S PLATFORM

When you access and browse the Platform, ISPWM may use cookies and similar technologies, such as page tags, for storing information to provide you a better experience.

This Cookie Policy only relates to your accessing and browsing the Platform.

"Cookies" are small text files that can be placed on your computer or mobile device in order to identify your web-browser and the activities of your computer on the Platform.

These help ISPWM to recognize you and your device and to store some information about your preferences or past actions.

For example, ISPWM may track how often you visit the Platform, which pages you view, traffic data, location data and your internet service provider, helping ISPWM to build a profile of the Website and App users.

"Page tags", also known as web beacons or gif tags, are a web technology used to help track websites or email usage information, such as how many times a specific page or email has been viewed. Page tags are invisible to you, and any portion of the Platform, including advertisements, or e-mails sent on ISPWM's behalf may contain page tags.

"Cookies" Page tags" and any other similar technologies are collectively defined as "**Cookies**".

The Platform may link to third parties' websites. These websites may also use cookies in accordance with their own cookie policies.

For information relating to these other third party websites, please consult their cookie policies.

2. WHY DOES ISPWM USE COOKIES?

ISPWM uses Cookies to:

- Personalize your experience on the Platform;
- Recognize you whenever you visit the Platform;
- Keep track of your specified preferences (such as your language preference);
- Carry out research and statistical analysis to help improve the content of the Platform;
- Detect and prevent fraud;
- Make your online experience more efficient and enjoyable;
- Analyse trends; and

- Conduct research, diagnostics and reporting to improve the Platform and analyse the performance of services.

3. TYPES OF COOKIES

All Cookies on the Platform fall into one of the three following categories:

- **Strictly Necessary:** these Cookies are essential for you to be able to navigate the Platform and use its features. Without these Cookies, the services you have asked for could not be provided (such as client's recognition on the Platform with Biometric Data (facial identification or fingerprint identification));
- **Functionality:** these Cookies allow our Platform to remember the choices you make (such as your username, language and search preferences) and provide enhanced, more personal features. The information collected by these Cookies is anonymous and cannot track your browsing activity on other websites; and
- **Performance:** these Cookies collect information about how you use the Platform, e.g. which pages you go to most often. These Cookies do not collect personally identifiable information about you. All information collected by these Cookies is aggregated and anonymous and is only used to improve how the Platform works.

4. COOKIES USED BY ISPWM

Here are some details of the cookies or similar functionalities on the Platform:

Strictly necessary Cookies		
Type of Cookie	Purpose of the Cookies	Expiry/deletion
Authentication Tokens (Keychain)	API tokens to access authenticated endpoints and enable all app functionalities requiring server interactions	Until logout or app deletion
Encrypted Passcode (Keychain)	Encrypted passcode used to allow biometric login (Face ID / fingerprint) .	Until app is deleted
Firebase Remote Config	Uses Firebase installation IDs to return app configurations based on context (e.g., app version, language). Enables forced updates, maintenance messages, or critical alerts	Varies (based on Firebase settings)
Sentry (Crash Reporting)	Captures error/crash reports, performance data, and general device information. No PII sent—scrubbing applied before transmission. Helps diagnose and prevent service degradation	Until issue is resolved / logs are deleted
Should Hide Balance (Shared Prefs)	Boolean flag to determine whether to blur the user's account balance on screen	Until reset or reinstallation
Intro View Shown (Shared Prefs)	Boolean flag indicating whether the intro/tutorial screens have already been shown	Until reset or reinstallation

5. **CONSENT TO USE COOKIES**

ISPWM will ask you for your consent to place Cookies on your device, except where these are technical, for ISPWM to provide you with a service that you have requested.

The Platform functions optimally if cookies are enabled. However, you can prevent Cookies from being set on your device via your browser's configuration tools. If Cookies are completely disabled, this may disable certain features of the Platform or prevent it from working properly altogether. Even with all Cookies disabled, your browser or device will still store a small amount of information, which is necessary for the basic functionality of the website and the app (strictly necessary cookies). For more information on how to change your cookie settings You can refer to the website of the manufacturer of the browser, device or operating system you are using.

There is a notice on the home page of the Platform which describes how ISPWM uses Cookies and requests your consent to place Cookies on your device.

6. **HOW TO CONTACT US?**

Please contact support@fideuramdirect.lu or support@fideuramdirect.be you have any questions about this Cookie Policy.

7. **AMENDMENTS TO THIS COOKIE POLICY**

ISPWM may amend this Cookie Policy from time to time to ensure that you are fully informed about ISPWM's use of Cookies. You will be notified of changes to the Cookie Policy by appropriate means.