

COOKIE POLICY

Effective Date: April 27, 2025

1. PURPOSE AND SCOPE

This Cookie Policy ("Policy") governs the use of cookies, web beacons, pixels, and other similar tracking technologies (collectively, "Cookies") by **RevoPro AI Artificial Intelligence Developing Services** ("RevoPro AI," "Company," "we," "us," or "our") when you access, browse, interact with, or otherwise use our website accessible at www.revopro.ai (the "Website").

The purpose of this Policy is to provide you with clear, transparent, and lawful information regarding:

- The nature and function of Cookies used by RevoPro AI;
- The categories and specific purposes of Cookies deployed on the Website, including tracking AI agent interactions;
- Your rights, choices, and control mechanisms relating to Cookie usage;
- Our obligations and your protections under applicable data protection and privacy laws.

This Policy applies to all visitors and users ("Users," "you," or "your") who access or interact with the Website, regardless of geographic location, device type, or method of interaction.

This Policy forms an integral part of, and is incorporated by reference into, our **Privacy Policy** and **Terms of Service**.

By continuing to access or use the Website, including engaging with RevoPro AI's AI agent services, you acknowledge and agree that Cookies may be used to track your interaction patterns for service improvement, token-based billing, and system diagnostics.

Users may manage their Cookie preferences at any time through the Cookie Settings Tool or browser configurations, as described in Section 11 of this Policy.

Nothing in this Policy limits your statutory rights under applicable law, including but not limited to:

- **UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data;**

- **Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR);**
- **Directive 2002/58/EC (ePrivacy Directive),** as amended.

2. DEFINITION OF COOKIES

For the purposes of this Policy, "Cookies" refer to small text files, tags, or data fragments that are stored on your device (computer, smartphone, tablet, or other internet-enabled device) when you access or interact with the Website.

Cookies are deployed to fulfill a range of essential and performance-based functions, including but not limited to:

- **Ensuring Technical Functionality:** Supporting core features of the Website such as login, navigation, secure sessions, and form submission.
- **Enhancing User Experience:** Retaining your preferences, such as language selection, interface layout, and prior interactions, to optimize repeat visits.
- **Analyzing Website and AI Agent Usage:** Tracking interaction logs, timestamps, and engagement metrics to evaluate the performance of our AI services and accurately measure **token consumption for billing** purposes.
- **Personalizing Services or Advertising:** Delivering tailored content, promotions, or ads based on your behavioral interactions or navigation history (if applicable and subject to your consent).

Cookies used on our Website are categorized by:

- **Origin:**
 - **First-Party Cookies:** Set directly by RevoPro AI or agents acting on its behalf for purposes such as security, usage metering, and personalization.
 - **Third-Party Cookies:** Set by external service providers (e.g., Stripe, Supabase, Make.com, Google Analytics) integrated with our Website and services.
- **Duration:**
 - **Session Cookies:** Automatically deleted when your browser is closed; used for temporary data handling (e.g., session tokens).
 - **Persistent Cookies:** Remain on your device for a defined duration to retain settings, facilitate token-based billing, or analyze repeated interactions.

Certain Cookies are also used to track your usage of RevoPro AI's chatbot and AI automation tools to compute service usage accurately, measure user experience, and ensure platform integrity.

Our deployment of Cookies follows the core principles of **transparency, necessity, data minimization, and user consent** in line with applicable laws.

3. LEGAL FRAMEWORK

RevoPro AI processes and deploys Cookies in full compliance with applicable international and local data protection laws governing tracking technologies, including:

- **Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (United Arab Emirates)** (“UAE Data Protection Law”), which mandates transparency, lawful purpose, user consent, and accountability for Personal Data processing;
- **Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR)**, which requires freely given, specific, informed, and unambiguous consent for the placement of non-essential Cookies;
- **Directive 2002/58/EC (ePrivacy Directive)**, as amended, which governs privacy in electronic communications and requires prior consent for most Cookies, except those strictly necessary.

Accordingly, RevoPro AI adheres to the following core principles:

- **Consent Requirement:** We obtain your clear, affirmative consent before placing or accessing any non-essential Cookies (e.g., Analytical, Functional, or Targeting Cookies), unless exempted under law (e.g., Strictly Necessary Cookies).
- **Transparency and Disclosure:** Prior to seeking consent, we provide clear and comprehensive information about the categories of Cookies used, their purposes (including tracking AI service interactions for billing accuracy), retention periods, and any third-party operators involved.
- **Right to Withdraw Consent:** You may withdraw your consent to the use of Cookies at any time via our Cookie Settings Tool, without affecting the legality of prior processing.
- **Recordkeeping Obligations:** We maintain verifiable records of Cookie consents as required under **Article 5(2) GDPR** and corresponding obligations under the **UAE Data Protection Law**.

Where consent is not properly obtained, non-essential Cookies will not be activated. Only **Strictly Necessary Cookies** will operate without user opt-in.

4. CATEGORIES OF COOKIES WE USE

RevoPro AI deploys the following categories of Cookies on the Website, each with a distinct purpose and regulatory requirement:

4.1 Strictly Necessary Cookies

These Cookies are essential for core Website functionality and include:

- Secure user login and session management
- Form submission and navigation continuity
- System security and fraud detection
- Management of Cookie consent preferences

They are **automatically activated** and **do not require prior consent** under applicable law.

4.2 Functional Cookies

These Cookies remember your settings and preferences to enhance your browsing experience, such as:

- Language, display, and region selections
- Persistent login preferences or display modes

They are deployed **only with your explicit consent**.

4.3 Analytical and Performance Cookies

These Cookies are used to evaluate Website performance and include:

- Pages visited and session durations
- Clickstream behavior and error tracking
- **Tracking token consumption during AI Agent interactions for billing and optimization**

Analytical Cookies are **subject to prior user consent** and are deployed in a privacy-preserving, aggregated format.

Future deployment may include integrations with Google Analytics or similar platforms, following compliance with GDPR international transfer requirements.

4.4 Targeting and Advertising Cookies

These Cookies, if activated in the future, would support:

- Personalized advertising based on user behavior
- Ad frequency capping
- Marketing campaign performance tracking

Currently, **no Targeting or Advertising Cookies are in use**. If implemented, users will receive advance notice and the right to provide or withhold consent.

4.5 Cookie Classification Summary

Cookie Category	Purpose	Consent Required
Strictly Necessary Cookies	Website security, authentication, and session handling	No
Functional Cookies	Remember preferences and improve usability	Yes
Analytical Cookies	Track usage metrics and AI token interactions	Yes
Targeting/Advertising Cookies	Personalized ads and marketing metrics	Yes (if implemented)

5. STRICTLY NECESSARY COOKIES

Strictly Necessary Cookies are indispensable for the Website to function properly. They are automatically activated and cannot be turned off through the Website’s consent tools.

Purposes include:

- **Authentication and Access Control:** Verifying secure access to password-protected areas;
- **Session Management:** Maintaining continuity across multiple page interactions;
- **Security Measures:** Detecting malicious behavior and preventing unauthorized access;
- **Consent Management:** Recording your acceptance or rejection of Cookie categories.

Legal Basis: Deployment of these Cookies is grounded in **RevoPro AI's legitimate interest** (under **Article 6(1)(f) GDPR**) and corresponding provisions of UAE privacy law to provide secure, reliable services.

User Impact:

- Cannot be disabled using the Cookie Settings Tool.
- May only be restricted at the browser level, which could impair Website functionality.

Examples of Strictly Necessary Cookies:

- **Authentication Tokens:** Validating authorized sessions.
- **Security Tokens:** Enforcing CSRF and fraud protection.
- **Session Cookies:** Supporting uninterrupted user navigation.

6. FUNCTIONAL COOKIES

Functional Cookies enhance the usability, personalization, and convenience of the Website by remembering choices you make during your interaction, thereby reducing repetitive actions.

These Cookies enable features such as:

- **Language Preferences:** Automatically displaying the Website in your chosen language;
- **Regional Settings:** Retaining preferred time zones, currencies, or localized displays;
- **Interface Customization:** Remembering settings for font sizes, layout modes, color themes, and accessibility options.

While not essential for the Website's operation, **Functional Cookies improve your overall experience**. Disabling them may result in reduced functionality or require you to reconfigure preferences on each visit.

Legal Basis and Consent:

- Functional Cookies are only set **after you provide prior, informed, and specific consent**, in compliance with **Article 6(1)(a) of the GDPR** and the **UAE Data Protection Law**;
- You may **withdraw your consent at any time** using the Cookie Settings Tool;

- If consent is not granted or is later withdrawn, these Cookies will not be stored or will be promptly deactivated.

7. ANALYTICAL AND PERFORMANCE COOKIES

Analytical Cookies (also called Performance Cookies) allow RevoPro AI to collect insights on how Users interact with the Website and with deployed AI agents. This includes **token-based tracking**, which enables accurate billing and AI performance optimization.

These Cookies collect aggregated, pseudonymized, or anonymized data, such as:

- **Page Visit Data:** Identifying popular pages and user entry/exit points;
- **Session Duration:** Measuring time spent on pages and drop-off behavior;
- **User Interaction Flow:** Understanding how Users navigate the Website;
- **Device & Browser Analytics:** Detecting compatibility issues or rendering problems;
- **AI Interaction Metrics:** Tracking AI chatbot usage, conversation volume, and **token consumption for service metering** and billing.

Deployment and Controls:

- Analytical Cookies are **only deployed upon your explicit consent** (GDPR Art. 6(1)(a));
- The data collected is used solely to enhance service functionality and reliability;
- Where possible, data is **aggregated and minimized** to reduce privacy risk;
- Retention periods for Analytical Cookie data are limited to what is necessary to fulfill performance goals, per our Privacy Policy.

Planned Tools:

- RevoPro AI may, in the future, implement **Google Analytics** or equivalent services;
- Any future third-party tools will be fully disclosed and subject to privacy-compliant implementation, including international transfer safeguards where required.

8. TARGETING AND ADVERTISING COOKIES

Targeting or Advertising Cookies are designed to deliver content or advertisements that are more relevant to your preferences and browsing behavior. These Cookies may also be

used to measure the performance of marketing campaigns and track your engagement across third-party sites.

They may enable:

- **Behavioral Ad Targeting:** Showing content or ads aligned with your past activity;
- **Frequency Capping:** Controlling how often an ad is displayed to you;
- **Cross-Site Profiling:** Tracking your browsing across other domains for remarketing purposes.

△ **RevoPro AI does not currently use Targeting or Advertising Cookies.**

If implemented in the future:

- Users will be provided with **clear disclosure** and the ability to accept or reject such Cookies;
- These Cookies will only be deployed **after receiving prior, specific, and informed consent** from the User;
- Refusal of consent will **not affect access to essential Website functionality**.

9. DURATION OF COOKIES

Cookies deployed on the Website vary in their duration, depending on their purpose and category:

- **Session Cookies:**
These are temporary and expire automatically when you close your browser. They are used to maintain session continuity, enable secure login, and preserve temporary form data.
- **Persistent Cookies:**
These remain on your device for a predefined period (e.g., days, months, or years) and are used to remember user settings, preferences, and login credentials, or to track service usage across sessions (e.g., for token-based billing).

The specific expiration date for each Cookie is disclosed in our **Cookie Consent Management Tool**, accessible via the Website interface.

Note: Cookies used to track AI agent interactions for token consumption may persist longer to ensure billing transparency and service continuity.

You can also manually manage or delete Cookies via your browser settings.

10. THIRD-PARTY COOKIES

RevoPro AI may authorize trusted third-party service providers to deploy Cookies on our Website to support analytics, hosting, CRM integration, or billing infrastructure.

Examples of third-party integrations include:

- **Netlify** – For hosting and content delivery optimization;
- **Supabase** – For secure storage and real-time database operations;
- **Stripe** – For encrypted payment processing (future integration);
- **Google Analytics** – For performance metrics and Website usage analytics (planned future deployment).

Each third-party provider maintains its own Cookie and privacy policy, which governs their data handling. RevoPro AI **does not control** the behavior, scope, or duration of third-party Cookies and encourages Users to review the relevant third-party policies.

All third-party Cookie activation is subject to your explicit consent via our Cookie Consent Tool.

11. CONSENT AND CONTROL MECHANISMS

RevoPro AI fully supports User autonomy and provides granular control over Cookie preferences in line with **Article 7 of the GDPR** and **Article 6 of the UAE Data Protection Law**.

You may manage consent using:

- **Cookie Consent Banner:**
Shown upon your first visit, this interface allows you to accept all Cookies, reject non-essential ones, or select specific categories (e.g., only enable Functional and Analytical Cookies).
- **Cookie Settings Tool:**
Available on the Website at all times, this tool enables you to **adjust your consent preferences dynamically**, including for AI interaction tracking Cookies.
- **Browser Settings:**
You may also use your browser's privacy settings to delete or block Cookies. However, disabling essential Cookies may affect the Website's core functionality.

Reminder: Consent is required only for non-essential Cookies (e.g., Functional, Analytical, Targeting). Strictly Necessary Cookies are exempt from consent under applicable law.

12. WITHDRAWAL OF CONSENT

You have the right to withdraw your consent to the use of Cookies at any time, without affecting the legality of any prior processing.

Methods of withdrawal include:

- **Cookie Settings Tool:**
Visit the settings interface on our Website and modify your selections to disable or delete non-essential Cookies.
- **Browser Configuration:**
Clear Cookies through your browser's privacy controls and disable future Cookie placement.
- **Direct Contact:**
Email your withdrawal request to our Data Protection Officer at **business@revopro.ai**, particularly if requesting removal of AI tracking data or future marketing preferences.

Upon withdrawal:

- All non-essential Cookies will be disabled or deleted;
- You may experience reduced functionality for certain features, including preference retention or AI billing continuity.

13. DATA COLLECTED THROUGH COOKIES

Cookies deployed on the Website may collect, store, or transmit certain categories of information that may constitute **Personal Data** within the meaning of the UAE Data Protection Law and the GDPR.

Examples of data collected via Cookies include:

- **IP Address:** Identifies your network connection and assists in fraud prevention and geo-optimization;
- **Browser Type and Version:** Ensures the Website displays properly based on compatibility;
- **Device Type and Operating System:** Helps adapt features to your environment for better performance;
- **Browsing Behavior:**
 - Pages visited, duration of visits, click paths, and frequency of access;

- Interactions with AI agents, including **conversation metadata**, **timestamped events**, and **token usage**, which may be used for **billing purposes**, **usage analysis**, and **service improvement**.

Where applicable, Cookie data may be:

- **Aggregated and Anonymized:** Used for analytics without identifying individual Users;
- **Combined with Voluntarily Provided Data:** If you submit forms or create an account, Cookie-derived data may be associated with your Personal Data to deliver customized services or improve accuracy of billing for AI agent usage.

All data processed through Cookies especially those tracking AI usage is subject to our [Privacy Policy], and is handled in accordance with the principles of:

- Lawfulness, fairness, and transparency;
- Purpose limitation and data minimization;
- Storage limitation and integrity;
- User rights including access, correction, deletion, and objection.

You may exercise these rights by contacting our Data Protection Officer.

14. UPDATES TO THIS POLICY

RevoPro AI reserves the right to amend or update this Cookie Policy at any time to reflect:

- **Regulatory Updates:** Compliance with new or amended privacy and data protection laws;
- **Technical Enhancements:** Adoption of new Cookies, analytics frameworks, or consent management tools;
- **Business Model Adjustments:** Changes to how we track AI agent interaction or usage for billing, reporting, or optimization.

Notification of Material Changes may be provided through one or more of the following:

- **Updated Effective Date** and posting on our Website;
- **Banner or pop-up** notifications upon visit;
- **Email notification** to Users who have submitted contact information.

Your continued use of the Website constitutes acceptance of any revised terms. We encourage Users to review this Policy periodically.

15. CONTACT INFORMATION

If you have any questions, concerns, or complaints about this Cookie Policy, or if you wish to withdraw your Cookie consent or exercise any rights under applicable law, please contact our designated Data Protection Officer:

Data Protection Officer (DPO)

RevoPro AI Artificial Intelligence Developing Services

✉ Email: business@revopro.ai

📍 Postal Address:

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