

# Cookies Policy

## Cookies Policy – Football Path X

**Last updated:** December 8th, 2025

**Entity:** Football Path X GmbH, Vienna, Austria

Football Path X GmbH (“**Football Path X**”, “**we**”, “**our**”, “**us**”) uses cookies and similar technologies on our website and web applications (“**Web App**”). This Cookies Policy explains what cookies are, how we use them, and the rights you have under the **GDPR**, the **ePrivacy Directive** (**EU Cookie Law**), and other applicable data protection regulations.

This Cookies Policy forms part of our **Privacy Policy**.

### 1. What Are Cookies?

Cookies are small text files placed on your device when you visit or interact with our Web App. They allow us to:

- Ensure the platform operates properly
- Improve user experience
- Secure our services
- Analyse usage to enhance functionalities
- Personalize content and recommendations

Cookies may be:

- **Session cookies**, which expire when you close your browser
- **Persistent cookies**, which remain on your device until manually deleted or expired
- **First-party cookies**, placed by Football Path X
- **Third-party cookies**, placed by trusted partners (e.g., analytics providers, payment processors, authentication partners)

### 2. Legal Basis for Using Cookies (GDPR)

Under the GDPR, we may process cookies based on:

#### a) Legitimate Interest (Art. 6(1)(f) GDPR)

Cookies necessary to operate our Web App, such as:

- Login/authentication
- Security functions
- User account management
- Platform performance

## b) Consent (Art. 6(1)(a) GDPR)

Cookies that are *not* essential require your explicit permission:

- Analytics
- Marketing
- Advertising
- Personalization

Consent is collected through our cookie banner and can be changed at any time in your browser settings or via the “Manage Cookies” option.

## 3. Types of Cookies We Use

### 3.1 Strictly Necessary Cookies (No Consent Required)

These ensure the Web App works as intended.

We use them to:

- Authenticate users
- Maintain session state
- Enable account creation and login (including Gmail, Apple or email login)
- Secure the platform
- Enable payment-related processes via third-party providers

Disabling these cookies will prevent the Web App from working correctly.

### 3.2 Functional Cookies

Used to remember preferences and enhance usability.

Examples:

- Language selection
- Dark/light mode preferences
- Saved form progress
- User interface personalization

These cookies help provide a smoother user experience.

### 3.3 Analytics & Performance Cookies (Consent Required)

We use analytics tools to understand how Users interact with the Web App and to improve performance.

These cookies:

- Collect anonymized usage statistics
- Measure platform performance
- Identify bugs or user-experience issues
- Help us understand content popularity

Data collected may include:

- IP address (pseudonymized)
- Device details
- Browser type
- User interaction patterns

We **never** use these cookies to identify you personally.

## 3.4 Marketing & Tracking Cookies (Consent Required)

Used only when we run marketing campaigns.

They help us:

- Measure the effectiveness of campaigns
- Personalize content
- Deliver relevant offers (e.g., subscription promotions)

Football Path X does **not** sell Personal Data to third parties.

# 4. Third-Party Cookies

We may work with trusted external providers, including:

- Authentication providers (Google, Apple)
- Analytics platforms (e.g., Google Analytics or similar tools)
- Payment processors for Subscription purchases

Third-party providers may place their own cookies to:

- Validate login
- Enable secure transactions
- Provide aggregated analytics

These providers are contractually bound by confidentiality and GDPR compliance requirements.

# 5. Cookies and Personal Data

Some cookies may process **Personal Data**, such as:

- Login credentials from Gmail/Apple login
- IP addresses (non-identifiable analytics)
- Usage and purchase history (indirect identifiers) for recommendations

The processing of Personal Data through cookies follows the same principles described in our **Privacy Policy**.

# 6. How to Manage or Disable Cookies

You can manage cookies through:

## Cookie Popup Settings

When visiting the Web App for the first time, you may:

- Accept all cookies
- Reject non-essential cookies
- Customize your preferences

## Browser Settings

You may delete or block cookies at any time using your browser:

- Chrome
- Safari
- Firefox
- Edge
- Opera

Blocking necessary cookies may make the platform unusable.

# 7. International Transfers

Some third-party providers may process cookies outside the EU.

Whenever such transfers occur, we ensure compliance with GDPR safeguards:

- Standard Contractual Clauses (SCCs)
- Adequacy decisions
- Data minimization and encryption measures

# 8. Updates to This Cookies Policy

We may update this Cookies Policy to reflect:

- Technical changes
- Legal requirements
- Platform improvements

Whenever changes are material, we will notify Users through the Web App or email.

# 9. Contact Us

If you have questions regarding this Cookies Policy, please contact us:

**Football Path X GmbH**

Vienna, Austria

Email: [info@footballpathx.com](mailto:info@footballpathx.com)

Website: [footballpathx.com](http://footballpathx.com)

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