

APPENDIX B: COOKIE POLICY

1. Who we are

- 1.1. ALX Holdings Limited (“ALX”, “we”, “us”) is a company registered in Mauritius.
- 1.2. Business registration number: C213364
- 1.3. Registered office address: 5th Floor, The CORE Building, No. 62, ICT Avenue, Cybercity, Ebene, Mauritius
- 1.4. We act as a ‘controller’ of the personal data to all information collected through our website (www.alxafrica.com), “Website”, “ALX Africa” or collected for the Services, as identified below.
- 1.5. Cookie Banner Wording: ALX Africa uses cookies for our website to function properly; some are optional and help deliver a personalized and enhanced experience. You can consent to all or allow any level of cookies via “Customize Settings,” and preferences can be changed at any time.
- 1.6. To learn more, Read Cookie Policy, or Manage Cookies to update your preferences.

2. Updates to this policy

- 2.1. We may update this Cookie Policy from time to time to reflect legal, technical, or operational changes. We encourage you to review this policy regularly.
- 2.2. This Cookie Policy explains how ALX Africa uses cookies and similar tracking technologies on its digital platforms. It outlines what these technologies are, why we use them, and your rights to control their use. This policy forms part of our broader Privacy Policy and is aligned with data protection laws including the General Data Protection Regulation (GDPR), ePrivacy Directive, POPIA, and other applicable regulations.

3. Purpose

- 3.1. The purpose of this Cookie Policy is to inform you about the types of cookies and similar tracking technologies we use on the ALX Africa Platform, why we use them, and how you can control them. It complements our main Privacy Policy by providing specific details on:
 - 3.1.1. How cookies enhance site functionality and user experience
 - 3.1.2. Which cookies are essential versus non-essential
 - 3.1.3. The legal bases for processing cookie-derived data (e.g., consent, legitimate interest)
 - 3.1.4. Your rights to accept, decline, or manage cookies

4. Scope

- 4.1. This policy applies to all visitors and users of the ALX Africa digital ecosystem, including but not limited to:
 - 4.1.1. www.alxafrica.com and all subdomains
 - 4.1.2. Web and mobile applications operated by ALX Africa
 - 4.1.3. Embedded widgets and third-party integrations
 - 4.1.4. Any other online services or platforms where this Cookie Policy is linked
- 4.2. It governs processing activities carried out by ALX Africa and its authorized service providers, in all jurisdictions in which we operate (e.g., under GDPR, POPIA, ePrivacy Directive, and other local data-protection laws). Continuous use of our platforms constitutes acceptance of this policy as amended from time to time.

5. Guiding Principles

- 5.1. The collection and use of cookie data on the ALX Africa Platform are guided by the following data protection and privacy principles:
 - 5.1.1. Transparency: We clearly inform users about the use of cookies, what data is collected, for what purposes, and with whom it may be shared.
 - 5.1.2. Consent and Choice: We obtain explicit consent for the use of non-essential cookies in compliance with data protection laws such as GDPR and the ePrivacy Directive. Users can update or withdraw their consent at any time.
 - 5.1.3. Data Minimization: We only collect cookie data that is necessary, relevant, and proportionate to the intended purposes.
 - 5.1.4. Purpose Limitation: Cookie data is only used for the specific purposes outlined in this policy, such as site performance, personalization, analytics, and marketing (with consent).
 - 5.1.5. Security and Confidentiality: We implement technical and organizational measures to ensure that cookie-related data is protected against unauthorized access, misuse, or loss.
 - 5.1.6. Accountability: We are accountable for how we use cookies and ensure that our practices are aligned with applicable data protection regulations across all jurisdictions where we operate.
 - 5.1.7. User Empowerment: Users are provided with accessible tools and clear options to manage their cookie preferences and understand the impact of their choices.

6. Definition

Key Terms	Definitions
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Analytics Cookies	Cookies used to collect data about how users interact with the site in order to improve functionality and user experience (e.g., Google Analytics).
Consent	A freely given, specific, informed, and unambiguous indication of the data subject's agreement to the processing of their personal data.
Consent Management Platform (CMP)	A tool used to capture and manage user consent preferences for cookies and other trackers in a compliant manner.
Cookies	Small text files placed on your device (computer, tablet, smartphone) by a website or web service to collect standard Internet log information and visitor behavior data.
Data Controller	The entity (in this case, ALX Holdings Ltd.) that determines the purposes and means of the processing of personal data.
Essential Cookies	Cookies strictly necessary for the functioning of the website or service. These enable basic features such as navigation, login, and access to secure areas.
Experimental Cookies	Experimental cookies are used to support testing of new features and experiences on the website, such as A/B testing or prototype interactions. These cookies help us determine which versions of content or design perform better, and may temporarily affect the layout or features a user sees. Data collected is typically anonymized and used for product optimization.
Functionality Cookies	Functionality cookies enable the website to remember user choices and preferences—such as language, region, or previous activity—to provide a more personalized and consistent experience. These cookies may store anonymized data and are typically used to enhance usability without tracking browsing activity across other websites.
Legitimate Interest	A lawful basis for processing personal data when it is necessary for the interests of ALX Holdings Ltd. or a third party, provided these are not overridden by the rights of the data subject.
Marketing/Targeting Cookies	Marketing or targeting cookies are used to track user behavior across websites in order to display relevant advertisements and promotional content. These cookies may be set by third-party advertising networks and help build a profile of your interests, enabling more targeted marketing efforts based on browsing habits and engagement signals.
Non-Essential Cookies	Cookies not required for core functionality, typically used for analytics, personalization, advertising, and social media integration. These

	require user consent before activation.
Performance Cookies	Performance cookies collect anonymous data about how users interact with the website, such as pages visited, time spent, and error messages encountered. This information helps us understand and improve site performance, user experience, and functionality over time. These cookies do not collect identifiable personal information.
Persistent Cookies	Cookies that remain on your device for a defined period or until you delete them manually.
Personal Data	Any information relating to an identified or identifiable natural person, such as name, email address, identification number, online identifiers, or other factors specific to their identity.
Session Cookies	Temporary cookies that are erased when you close your browser or end your session.
Third-Party Cookies	Cookies placed by domains other than the one you are visiting (e.g., embedded video players, social media plugins, or ad networks).
Tracking Technologies	Tools such as web beacons, pixels, tags, scripts, and local storage that may be used alongside cookies to collect and analyze user data, including interactions, preferences, and session activity.

7. Types of Cookies we use

7.1. Essential cookies

Type	Purpose	Data Collected	Duration
Essential Cookies	Required for basic website functionality and security. Cannot be disabled.	Session ID, authentication data	Session-based or 6–12 months
cookieConsent	Stores user's cookie preferences	Consent status	6–12 months
session_id	Maintains session state across pages	Session ID	Session

7.2. Performance Cookies

Type	Purpose	Data Collected	Duration
Performance Cookies	Improve site performance and user experience	Pageviews, funnel progress, analytics events	1 minute – 2 years
pageview_stage	Tracks user progress through sign-up funnel	Page progression data	30 days
skill_track_viewed	Records viewed skill tracks	Skill track IDs	30 days
programme_viewed	Logs viewed programme detail pages	Programme IDs	30 days

7.3. Functionality Cookies

Type	Purpose	Data Collected	Duration
Functionality	Remember user preferences and improve UX	Preferences, settings	7–60 days
careerInterest	Stores selected journey or skill path	Selected journey/track	60 days
lastVisitedProgram	Resume journey CTA	Last visited program	30 days
quizStarted	Recalls partial progress	Quiz state	7 days
downloadedBrochure	Tracks brochure downloads	Brochure download status	14–30 days
lastVisitedSkillTrack	Reminds user of previously selected skill track	Skill track ID	30 days

7.4. Analytics Cookies

Type	Purpose	Data Collected	Duration
Analytics	Track user interactions for improvements	Clicks, time on page, bounce rate	30 days – 2 years

(Grouped under Performance in original list) Use <code>_ga</code> , <code>_gid</code> , <code>_gat_gtag</code> , etc.		
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7.5. Experimental Cookies

Type	Purpose	Data Collected	Duration
Experimental	Used for A/B testing and feature experimentation	Test group ID, interaction states	Session–14 days
abTestGroup	Assigns A/B test variant	Test group assignment	14 days
aiAgentState	Stores interaction with AI agent	Chat or interaction state	Session

7.6. Third Party Cookies

Type	Purpose	Data Collected	Duration
retargetIntent	Flags high-intent behavior for remarketing	Interaction flags	30 days
brochureDownloadIntent	Triggers retargeting after download	Download flag	30 days

7.7. Marketing/Targeting Cookies

Type	Purpose	Data Collected	Duration
_fbp	Facebook retargeting	Facebook ID, browsing	3 months
_gcl_au	Google Ads click tracking	Ad click ID	90 days
_ga	Google Analytics tracking	Anonymous ID, usage stats	1–2 years
_gid	Google Analytics tracking	Anonymous ID, usage stats	1–2 years
_gat_gtag	Throttle request rate to Google Analytics	Request rate limit token	1 minute

8. What Data do Cookies collect?

- 8.1. Depending on the type of cookie, we may collect:
 - 8.1.1. IP address
 - 8.1.2. Browser type and version
 - 8.1.3. Device information
 - 8.1.4. Referring and exit pages
 - 8.1.5. Click behavior and session data
 - 8.1.6. Page response times
 - 8.1.7. Geolocation (approximate)
 - 8.1.8. Tracking IDs and preferences

9. Personalization Based on User Type

- 9.1. As part of our user experience strategy, the ALX Africa Platform uses cookies and similar tracking technologies to differentiate between new and returning users. This enables us to provide a tailored journey that improves usability and supports learners in making informed choices.
 - 9.1.1. New Users: Cookies help guide first-time visitors through a simplified, goal-based journey selector, reducing cognitive load and avoiding overwhelming choices. This approach supports low-commitment actions such as browsing programmes by interest or job function.
 - 9.1.2. Returning Users: Returning visitors are recognized through persistent cookies, which allow the platform to recall previous interactions, surface relevant content, and display context-specific calls-to-action (CTAs). This personalization helps returning users pick up where they left off and move more efficiently through their ALX journey.
- 9.2. This use of cookies is subject to your explicit consent. These personalization capabilities are enabled through a combination of Functionality, Performance, and Persistent Cookies, as detailed in the sections “Types of Cookies We Use” and “What Data Do Cookies Collect?”.

10. Legal Basis for use of Cookies

We use cookies under the following legal bases:

Purpose	Legal Basis
Essential Cookies (such as Site security, platform functionality)	Performance of the contract
Analytics, performance, experimental cookies	Consent

Personalization and targeted communications	Consent (via cookie banner opt-in)
Marketing activities and behavioral tracking	Consent (via cookie banner opt-in)
Third party Cookies	Consent (via cookie banner opt-in)

11. Device and Terminal Equipment Coverage

- 11.1. Cookies and similar tracking technologies may be stored on and accessed from any device or terminal equipment you use to access our services, including:
 - 11.1.1. Computers and laptops
 - 11.1.2. Smartphones and tablets
 - 11.1.3. Smart TVs
 - 11.1.4. Connected devices and systems (e.g., in-car browsers or IoT-enabled devices)
- 11.2. Please note that cookies are stored per browser and device. For example, if you visit our site using Chrome on your laptop, the cookie is stored only in that browser. If you later access the site via Safari on your phone, you will appear as a new visitor, as no cookie exists yet in that browser.
- 11.3. Your consent choices apply across platforms where technically feasible. However, due to technical limitations, we may not be able to link your preferences across different devices or browsers unless you are logged in.

12. Third-Party Access to Cookies

- 12.1. We may allow certain trusted third parties to access cookies on your device. These include, but are not limited to:
 - 12.1.1. Analytics providers (e.g., Google Analytics)
 - 12.1.2. Marketing and advertising partners (e.g., Meta/Facebook, LinkedIn)
 - 12.1.3. Platform service providers (e.g., HubSpot, Intercom)
- 12.2. These third parties may use cookies to collect information about your browsing behavior and interactions with our site for analytics, personalization, or targeted advertising purposes.
- 12.3. For details on how these third parties use your data, please refer to their respective privacy and cookie policies:
 - 12.3.1. [Google Privacy & Terms](#)
 - 12.3.2. [Meta Privacy Policy](#)
 - 12.3.3. [LinkedIn Privacy Policy](#)
- 12.4. You can manage or withdraw your consent for third-party cookies at any time through our Cookie Preferences settings.

13. Consent and Control

- 13.1. When you first visit the ALX Africa Platform, a cookie banner will appear:
 - 13.1.1. You may accept all, reject non-essential, or customize your cookie preferences.
 - 13.1.2. You may update your preferences at any time via your browser settings or our consent management tool.
 - 13.1.3. Essential cookies will always be set to ensure platform functionality.

14. How to Manage or Disable Cookies

- 14.1. You can manage or disable cookies through your browser settings. Please refer to your browser's help menu for guidance:
 - 14.1.1. Chrome: <https://support.google.com/chrome/answer/95647>
 - 14.1.2. Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
 - 14.1.3. Safari: <https://support.apple.com/en-us/HT201265>
- 14.2. Disabling cookies may affect your experience and functionality of the ALX Africa Platform.

15. How to Contact us

5th Floor, The CORE Building
No. 62, ICT Avenue
Cybercity, Ebene
Mauritius
Email: support@alxafrica.com

You agree that the only way to provide us legal notice is at the above email and physical address.