

# GDPR Cookie Policy

**Policy Owner:** Ry Mercado

**Effective Date:** 08-26-24

## 1. Application

This policy applies to all employees, contractors, and vendors while doing business with Shelton AI and others who have access to European Union (EU) and the European Economic Area (EEA) data subject information (“personal data”) in connection with Shelton AI’s operating activities.

## 2. Policy

Shelton AI believes in transparency about collection and use of data. This policy provides information about how and when Shelton AI uses cookies for these purposes. Capitalized terms used in this policy but not defined have the meaning set forth in our Privacy Policy, which also includes additional details about the collection and use of information at Shelton AI.

### What is a cookie?

Cookies are small text files sent by us to your computer or mobile device, which enable Shelton AI features and functionality. They are unique to your account or your browser. Session-based cookies last only while your browser is open and are automatically deleted when you close your browser. Persistent cookies last until you or your browser delete them or until they expire.

### Does Shelton AI use cookies?

Yes. Shelton AI uses cookies and similar technologies like single-pixel gifs and web beacons. Shelton AI uses both session-based and persistent cookies. Shelton AI sets and accesses cookies on the domains operated by Shelton AI and its corporate affiliates (collectively, the “Sites”). In addition, Shelton AI uses third party cookies, like Datadog RUM.

### How is Shelton AI using cookies?

Some cookies are associated with your account and personal information to remember that you are logged in and which workspaces you are logged into. Other cookies are not tied to your account but are unique and allow us to carry out analytics and customization, among other similar things. Cookies can be used to recognize you when you visit a Site or use our Services, remember your preferences, and give you a personalized experience that is consistent with your settings. Cookies also make your interactions faster and more secure. Visit our <cookie tables> to learn more.

### Categories of use

- **Authentication:** If you're signed into the Services, cookies help Shelton AI show you the right information and personalize your experience.
- **Security:** Shelton AI uses cookies to enable and support security features, and to help detect malicious activity.
- **Preferences, features, and services:** Cookies denote which language you prefer and what your communications preferences are. They can help fill out forms on our Sites more easily. They also provide you with features, insights, and customized content.
- **Marketing:** Shelton AI may use cookies to help deliver marketing campaigns and track their performance (e.g., a user visited sheltonai.com and then made a purchase). Similarly, Shelton AI’s partners may use cookies to provide us with information about your interactions with their services,

but use of those third-party cookies would be subject to the service provider's policies.

- **Performance, Analytics, and Research:** Cookies help Shelton AI learn how well the Sites and Services perform. Shelton AI also uses cookies to understand, improve, and research products, features, and services, including to create logs and record when you access our Sites and Services from different devices, such as your work computer or your mobile device.

### **What third-party cookies does Shelton AI use?**

You can find a list of the third-party cookies that Shelton AI uses on our sites along with other relevant information in the cookie tables. Shelton AI does its best to keep this table updated, but please note that the number and names of cookies, pixels, and other technologies may change from time to time.

### **How are cookies used for advertising purposes?**

Cookies and other ad technology such as beacons, pixels, and tags help Shelton AI market more effectively to users that may be interested in the Services. They also help with aggregated auditing, research, and reporting.

**What can you do if you don't want cookies to be set or want them to be removed?** You have the option to disable and delete cookies that may not be necessary for the basic functionality of our website. Please note, blocking categories may impact your experience on our website. To manage cookies, you can:

- **Use Your Browser's Developer Tools:** You can modify or delete cookies directly through your browser's developer panel. This can typically be accessed by right-clicking on the webpage, selecting "Inspect" or "Inspect Element," and navigating to the "Application" or "Storage" tab, where you can view and manage cookies stored on your device.

**Please note that blocking or deleting cookies may affect the functionality and performance of our website.**

### **Does Shelton AI respond to Do Not Track Signals?**

The Sites and Services do not collect personal information about your online activities over time and across third-party websites or online services. Therefore, "do not track" signals transmitted from web browsers do not apply to the Sites or Services, and Shelton AI does not alter any data collection and use practices upon receipt of such a signal.

## **2.1. IP Addresses and Geolocation Data**

Shelton AI may collect and process your IP address and geolocation data, subject to your consent. This information is used to enhance security, improve our services, and personalize your experience. The collection and use of this data are carried out in compliance with GDPR requirements.

### **How is Shelton AI using IP addresses and geolocation data?**

IP addresses and geolocation data help Shelton AI provide localized content, enhance security features, and analyze site performance. For example, we may use this information to detect potential fraud or unauthorized access to your account.

Categories of use:

- **Security:** IP addresses and geolocation data can be used to detect and prevent malicious activities and ensure the safety of your account.
- **Personalization:** This data may be used to provide you with customized content and services

based on your location.

- **Analytics:** Shelton AI may use this data to analyze how our services are accessed and used in different regions to improve our offerings.

## Appendix A: Cookie Tables Sample

### Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but that will cause some parts of the site to not work. These cookies do not store any personally identifiable information.

Cookie Subgroup	Cookies	Cookies used
sheltonai.com	csrftoken, sessionid, user_id	First party

### Performance Cookies

These cookies (Shelton AI uses Datadog RUM) allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. If you do not allow these cookies we will not know when you have visited our site and will not be able to monitor its performance.

To view an overview of the privacy of your Datadog RUM cookies please go here:

<https://www.datadoghq.com/legal/cookies/>.

Cookie Subgroup	Cookies	Cookies used
sheltonai.com	_dd_s	Performance Cookies

### Third Party Website Cookies

When using our website, you may be directed to other websites for such activities as surveys, to make payment, for job applications, and to view content hosted on those sites such as an embedded video or news article. These websites may use their own cookies. We do not have control over the placement of cookies by other websites you visit, even if you are directed to them from our website.

Cookie Subgroup	Cookies	Cookies used
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sheltonai.com	intercom-device-id-jrtehdfv, intercom-session-jrtehdfv,	Third party
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## How To Control and Delete Cookies

### 1. Using Your Browser

Many of the cookies used on our website and through emails can be enabled or disabled through our consent tool or by disabling the cookies through your browser. To disable cookies through your browser, follow the instructions usually located within the “Help,” “Tools” or “Edit” menus in your browser. Please note that disabling a cookie or category of cookies does not delete the cookie from your browser unless manually completed through your browser function.

### 2. Cookies Set in the Past

Collection of your data from our analytics cookies can be deleted. If cookies are deleted, the information collected prior to the preference change may still be used. However, we will stop using the disabled cookie to collect any further information from your user experience. For our marketing cookie, when a user opts out of tracking, a new cookie is placed to prevent users from being tracked.

## Version History

Version	Date	Description	Author Approved by
1.0	01/05/24	Initial policy	Ry Mercado Ry Mercado
1.0.1	08/26/24	Updated policy	Ry Mercado Ry Mercado