CRCLES Cookie Notice

Last updated: 2 November 2026. This notice explains what cookies and similar technologies CRCLES uses, what they do, and how you can control them. It works together with our Privacy Notice, which explains who we are, your rights, recipients, transfers and retention where cookie data is personal data.

1. What cookies are

Cookies are small text files placed on your device when you use a website. Similar technologies - such as local storage, pixels and scripts - do comparable jobs. Some are needed for the platform to work at all; others are optional and used only with your consent.

2. The cookies and similar technologies we use

Category	What they do	Consent needed?	Duration
Strictly necessary	Only what is essential to provide the function you request: keeping you signed in, securing your account, preventing fraud, recording your cookie choice, and remembering the language you choose: for this we store the language code and nothing else, with no identifier, nothing used for tracking or profiling, kept no longer than needed, set before your cookie choice so that the page is shown in your language	No	From a few minutes to one year, as listed in section 5
Measurement (first-party)	Understanding how the platform is used so we can improve it and fix problems. Once you sign in, this measurement is linked to your account by an internal identifier, without your name or email address. Off by default, behind a single switch: until you turn it on, browser measurement does not start and writes nothing to your device, and you can still use the platform. We use PostHog for this measurement, hosted in its EU cloud: its script is loaded from PostHog only after you turn measurement on.	Yes	One year on your device. The data collected are kept for 24 months, with a review after the first 12 months (see the Privacy Notice, Section 10)

At launch we use two categories only. Strictly necessary cookies include remembering the language you choose: they are not a separate category and need no consent. Measurement cookies are the only optional category, and they are off unless you turn them on. There is no third category: we do not use personalisation, recommendation or marketing cookies, we do not use third-party advertising cookies, and we do not allow third-party advertising tracking. Your cookie choice controls measurement in your browser; separate platform analytics are described in our Privacy Notice. On payment screens, our payment provider loads its own scripts and card fields from its own site; if you choose to sign in with Google, that step takes place on Google's site.

3. The public bottle page

The public page you reach by scanning a bottle's NFC tag may show the bottle's story, provenance and product information, including food information where applicable. Because this page may be used to provide electronic product information, it is designed to be free of advertising, marketing content and tracking: it does not identify who scans it, does not show who owns the bottle, does not use measurement or advertising cookies, and does

not allow third parties to track visitors. It uses only technologies that are strictly necessary to display the page securely and reliably and to provide the information requested by the scan. We will not use optional cookies, tracking or marketing on a page used to provide electronic product information: this applies everywhere, not only where the law prohibits it.

4. Your choices

When you first visit, a banner asks you whether to allow measurement cookies. Until you choose, we set only strictly necessary cookies; the one that records your choice is set when you make it. Scrolling, closing the banner or continuing to browse is not consent: measurement cookies stay off until you turn them on. "Accept all optional cookies" and "Reject all optional cookies" are equally prominent and take the same number of clicks - rejecting is never a step further away than accepting; nothing optional is pre-ticked, and you can refuse without losing access to the platform. You can reopen and change your choice at any time from the cookie control shown on every page, and the change takes effect at once, without reloading the page; you can also control or delete cookies through your browser. We ask the same question, in the same way, of every visitor wherever they are: we do not vary the banner or the cookies we set by country. If you refuse measurement cookies, the platform still works: choices that are strictly necessary or that you make yourself - such as your language - are still remembered. Withdrawing consent does not automatically delete cookies already on your device (you can delete them in your browser); from withdrawal, we stop using measurement cookies unless you consent again.

We record your choice together with the time you made it and the version of this notice you saw. We keep it on your device and on our servers in the European Union, without your IP address. We keep a history of your choices as proof of your consent. We ask you to choose again after twelve months, whenever this notice changes, and whenever the law requires it.

5. Current cookie list

All the items below are set by us, on our own domain, except where stated. We update the list when our cookie use changes.

Signing in (strictly necessary, set when you sign in): crcles-prod.session_token keeps you signed in, 30 days, renewed while you are active; crcles-prod.marketplace_otp_flow and crcles-prod.marketplace_otp_sent_state handle the email sign-in code, up to 15 minutes; crcles-prod.oauth_state, crcles-prod.marketplace_oauth_outcome and crcles-prod.marketplace_revoked_session protect sign-in with Google, 2 to 10 minutes.

Your cookie choice (strictly necessary, set when you make it): c15t and cmless-consent-policy-id (each a cookie and local storage) record your choice and the version of this notice, one year on your device; c15t-pending-… (local storage) holds the choice until it reaches our servers, then is removed; c15t-storage-test-key (local storage) checks that storage works and is removed at once.

Language and page display (strictly necessary, set before your cookie choice): cmless-last-locale, the language you see, 300 days; generaltranslation.locale and generaltranslation.enable-i18n, set by our translation software, until you close the browser (generaltranslation.locale-reset and generaltranslation.region are added only if you change language); tsr-scroll-restoration-v1_3 (session storage), your position on the page, until you close the tab.

Measurement (optional, only after you turn it on): PostHog cookie and local storage (ph_…), one year on your device.

6. Changes and contact

We update this notice when our cookie use changes; the date of the latest version is shown at the top. Questions about cookies: privacy@crcles.com. For how we use personal data, including your rights, recipients, international transfers and retention, see our Privacy Notice.