

# ORAMAVR COOKIE POLICY

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Standard-Form Document URL: [oramavr.com/legal/cookie-policy](https://oramavr.com/legal/cookie-policy)

## 0. Status and Scope

This Cookie Policy ("Cookie Policy") explains how ORamaVR SA ("ORamaVR", "we", "us", or "our") uses cookies and similar technologies on:

- the corporate Website at [oramavr.com](https://oramavr.com) and its sub-paths;
- the customer portal at [portal.oramavr.com](https://portal.oramavr.com);
- the Org-Admin Portal of the VTC Platform (web interfaces only — the in-headset XR runtime does not use cookies and is not within the scope of this Cookie Policy);
- the support forum and the legal documents portal at [oramavr.com/legal](https://oramavr.com/legal).

This Cookie Policy supplements, and should be read together with, the ORamaVR Privacy Policy ([oramavr.com/legal/privacy-policy](https://oramavr.com/legal/privacy-policy)). In the event of conflict between this Cookie Policy and the Privacy Policy on matters within the scope of this Cookie Policy, this Cookie Policy prevails.

## 1. What are cookies and similar technologies

**Cookies.** A cookie is a small text file that a website places on your device when you visit it, which the website reads on subsequent visits. Cookies enable a website to recognise your device, remember your preferences, support security and authentication, and analyse how the site is used.

**Similar technologies.** For the purposes of this Cookie Policy, "cookies" also includes HTML5 local storage and session storage, IndexedDB and Web SQL, pixel tags and web beacons, and device fingerprinting (where used). The same rules apply to these similar technologies unless otherwise stated.

**First-party and third-party cookies.** First-party cookies are placed by ORamaVR directly. Third-party cookies are placed by service providers we engage. Third-party cookies are subject to the privacy policy of the relevant third party in addition to this Cookie Policy.

**Session and persistent cookies.** A session cookie is deleted when you close your browser. A persistent cookie remains on your device until it expires or you delete it.

## 2. Legal framework and consent

### 2.1 Legal framework

ORamaVR's use of cookies is governed by: the ePrivacy Directive 2002/58/EC (as amended), as transposed by the EU Member State of the user's residence; the GDPR, where the cookie processes Personal Data; the revFADP, where the cookie processes Personal Data of users in Switzerland; and equivalent national laws where applicable.

### 2.2 Consent model — prior consent for non-essential cookies

Except for Strictly Necessary Cookies (see §3.1), ORamaVR places cookies on your device only after you have given specific, informed, and unambiguous consent through the cookie consent banner presented at first visit and re-presented as required.

Consent is collected through an active opt-in (for example, by clicking "Accept" or by selecting categories in the preferences panel). Continued use of the Website does not constitute consent, and consent is not inferred from inactivity, scrolling, or pre-ticked boxes. This consent model is consistent with the requirements of Article 5(3) of

the ePrivacy Directive as interpreted by the Court of Justice of the European Union in Planet49 (Case C-673/17) and the EDPB Guidelines 05/2020 on consent under the GDPR.

You may withdraw consent at any time by re-opening the cookie preferences centre at [oramavr.com/legal/cookie-preferences](https://oramavr.com/legal/cookie-preferences) (or via the persistent "Cookie Preferences" link in the Website footer). Withdrawal of consent takes effect immediately and does not affect the lawfulness of prior cookie processing.

### 2.3 Lawful basis for cookie-related Personal Data processing

Cookie category	Lawful basis
Strictly Necessary	Legitimate interests (Art. 6(1)(f)) — operating and securing the Website; performance of a contract (Art. 6(1)(b)) where the cookie supports an authenticated session. No consent required.
Functionality / Preferences	Consent (Art. 6(1)(a)).
Performance / Analytics	Consent (Art. 6(1)(a)).
Targeting / Advertising	Not used by ORamaVR. See §3.4.

## 3. Categories of cookies we use

This Section 3 sets out the categories of cookies in use on the ORamaVR Website and Org-Admin Portal as at the Effective Date.

### 3.1 Strictly Necessary Cookies — always active

These cookies are essential for the Website and the Org-Admin Portal to function. They support core navigation, secure authentication, session persistence, load balancing, and consent recording. They do not require consent under Article 5(3) ePrivacy Directive because they are strictly necessary to provide a service explicitly requested by the user.

Cookie name	Provider	Purpose	Duration	Party
CookieLawInfoConsent	CookieYes / GDPR Cookie Consent	Stores user's overall consent state across all categories	Session	1st-party
viewed_cookie_policy	CookieYes / GDPR Cookie Consent	Indicates whether the user has acknowledged the cookie banner	1 year	1st-party
cookieLawInfo-checkbox-necessary	CookieYes / GDPR Cookie Consent	Records user consent for the necessary cookie category	1 year	1st-party
cookieLawInfo-checkbox-functional	CookieYes / GDPR Cookie Consent	Records user consent for the functional cookie category	1 year	1st-party

cookieawinfo-checkbox-analytics	CookieYes / GDPR Cookie Consent	Records user consent for the analytics cookie category	1 year	1st-party
cookieawinfo-checkbox-performance	CookieYes / GDPR Cookie Consent	Records user consent for the performance cookie category	1 year	1st-party
cookieawinfo-checkbox-advertisement	CookieYes / GDPR Cookie Consent	Records user consent for the advertising cookie category (no advertising cookies are set)	1 year	1st-party

### 3.2 Functionality / Preferences Cookies — consent required

These cookies allow the Website to remember choices you have made and to provide enhanced features.

Cookie name	Provider	Purpose	Duration	Party
__Secure-ROLLOUT_TOKEN	YouTube / Google LLC	Manages YouTube player feature rollout and playback session (set only when a page with an embedded YouTube video loads)	~6 months	3rd-party

### 3.3 Performance / Analytics Cookies — consent required

These cookies collect aggregated, mostly de-identified information about how visitors use the Website (pages visited, time on page, navigation paths, errors encountered). We use this information to understand and improve the Services.

Analytics providers: (1) Google LLC (Google Analytics 4) on oramavr.com — Property G-8G65EPRCR9; (2) HubSpot, Inc. on oramavr.com for CRM-integrated visitor tracking and form attribution. The ORamaVR Org-Admin Portal has no analytics provider deployed.

Cookie name	Provider	Purpose	Duration	Party
_ga	Google LLC (Google Analytics 4)	Distinguishes unique users by assigning a randomly generated client ID	2 years	3rd-party
_ga_8G65EPRCR9	Google LLC (Google Analytics 4)	Persists session state for the GA4 property G-8G65EPRCR9	2 years	3rd-party

__hstc	HubSpot, Inc.	Tracks visitors for HubSpot analytics and form submissions (visitor identity, sessions, campaign source)	~6 months	3rd-party
hubspotutk	HubSpot, Inc.	Identifies unique visitors and links form submissions to the same contact record	~6 months	3rd-party

### 3.4 Targeting / Advertising Cookies — NOT USED

ORamaVR does not use cookies for targeted advertising, behavioural advertising, advertising-network identifiers, ad-retargeting, ad-attribution, or sale of cookie-derived data to third parties for advertising purposes. The category is listed here for transparency to make the absence explicit. This position is consistent with Privacy Policy §3.6.

## 4. Cookies and the VTC Platform XR runtime

The VTC Platform consists of (a) web interfaces (the Org-Admin Portal and the customer portal) and (b) the in-headset XR runtime. The web interfaces use cookies in accordance with this Cookie Policy. The in-headset XR runtime does not use cookies. It uses local application storage, session tokens, and device-bound identifiers governed by the Privacy Policy and Exhibit C.

## 5. Third-party cookies and cross-border transfers

Where a third-party cookie processes Personal Data and that processing involves a transfer of Personal Data outside the EEA or Switzerland, the transfer is subject to the safeguards described in Privacy Policy §5.2, which include the 2021 EU Standard Contractual Clauses, Module Two (and, where applicable, the Swiss FDPIC supplemental clauses). The current third-party providers are also reflected at the Sub-processor List URL ([oramavr.com/legal/sub-processors](https://oramavr.com/legal/sub-processors)) where applicable.

## 6. Managing your cookie preferences

**6.1 Cookie preferences centre.** You may set, review, or change your cookie preferences at any time through the cookie preferences centre at [oramavr.com/legal/cookie-preferences](https://oramavr.com/legal/cookie-preferences) (or via the persistent "Cookie Preferences" link in the Website footer). Changes take effect immediately.

**6.2 Browser controls.** Most browsers allow you to view, manage, and delete cookies stored on your device. If you set your browser to reject all cookies, parts of the Website and Services may not function correctly.

**6.3 Effect of refusing non-essential cookies.** If you refuse non-essential cookies, you can continue to use the Website and the Org-Admin Portal. Strictly Necessary cookies remain active in all cases.

**6.4 Do Not Track and Global Privacy Control.** ORamaVR honours the Global Privacy Control (GPC) signal; receipt of a GPC signal is treated as a withdrawal of consent for non-essential cookies for the relevant browsing session. ORamaVR does not currently honour the Do Not Track (DNT) signal as a stand-alone consent withdrawal mechanism, as DNT is no longer maintained as a standard.

## 7. Your rights

In respect of Personal Data processed through cookies, you have the rights set out in Privacy Policy §8, including the rights of access, rectification, erasure, restriction, objection, data portability, withdrawal of consent, and the right to lodge a complaint with a supervisory authority (including the Swiss FDPIC). To exercise any right, contact the Data Protection Officer at [dpo@oramavr.com](mailto:dpo@oramavr.com).

## 8. Changes to this Cookie Policy

ORamaVR may update this Cookie Policy from time to time. Where a change is material (addition of a new cookie category, a new third-party provider, or a new cross-border transfer mechanism), we will notify users by re-presenting the cookie consent banner and, where appropriate, by giving at least thirty (30) days' notice through the Website.

## 9. Contact

**Data Protection Officer:** [dpo@oramavr.com](mailto:dpo@oramavr.com)

**General contact:** [info@oramavr.com](mailto:info@oramavr.com)

**Postal:** ORamaVR SA, 34 route de la Galaise, c/o FONGIT, CH-1228 Plan-les-Ouates, Geneva, Switzerland

You may also lodge a complaint with the Swiss FDPIC at [edoeb.admin.ch](http://edoeb.admin.ch), or with the data protection supervisory authority of your country of habitual residence.

## Document Control

Version	Date	Status	Notes
v1.0-R	4 June 2026	Reviewed — awaiting execution / publication	Code convention harmonised (OVR-POL-003); prior draft history retired.
v.2_R	11 June 2026	Issued — Release Edition v.2_R	v.2_R release: version code unified across GTM suite.