



TALENT PRO

Cookie and Tracking Technologies Policy

Walumo

Version: 3.0

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1. Purpose of this Policy

This Cookie and Tracking Technologies Policy explains how **Walumo**, through the **Talent Pro** platform, uses cookies, mobile identifiers, local storage, software development kits, pixels, web beacons, session identifiers, device storage, and similar technologies.

This Policy applies when a user accesses Talent Pro through:

1. The Talent Pro website;
2. The Talent Pro web application;
3. The Talent Pro mobile application;
4. Any embedded browser, webview, or in-app page;
5. Transactional emails, where tracking technologies are used;
6. Third-party integrations used to provide authentication, hosting, analytics, communications, payment, security, artificial intelligence, or platform support.

This Policy is intended to operate together with the Talent Pro Privacy Policy, Terms and Conditions, Artificial Intelligence Terms, Data Processing Addendum, and any country-specific privacy notice that may apply.

Where a law provides stronger protection than this Policy, Talent Pro will apply the stronger standard.

2. Who We Are

Talent Pro is operated by **Walumo**, the innovation and technology arm responsible for building and managing digital products, including HRTech, recruitment, workforce, productivity, and business solutions.

For the purposes of this Policy:

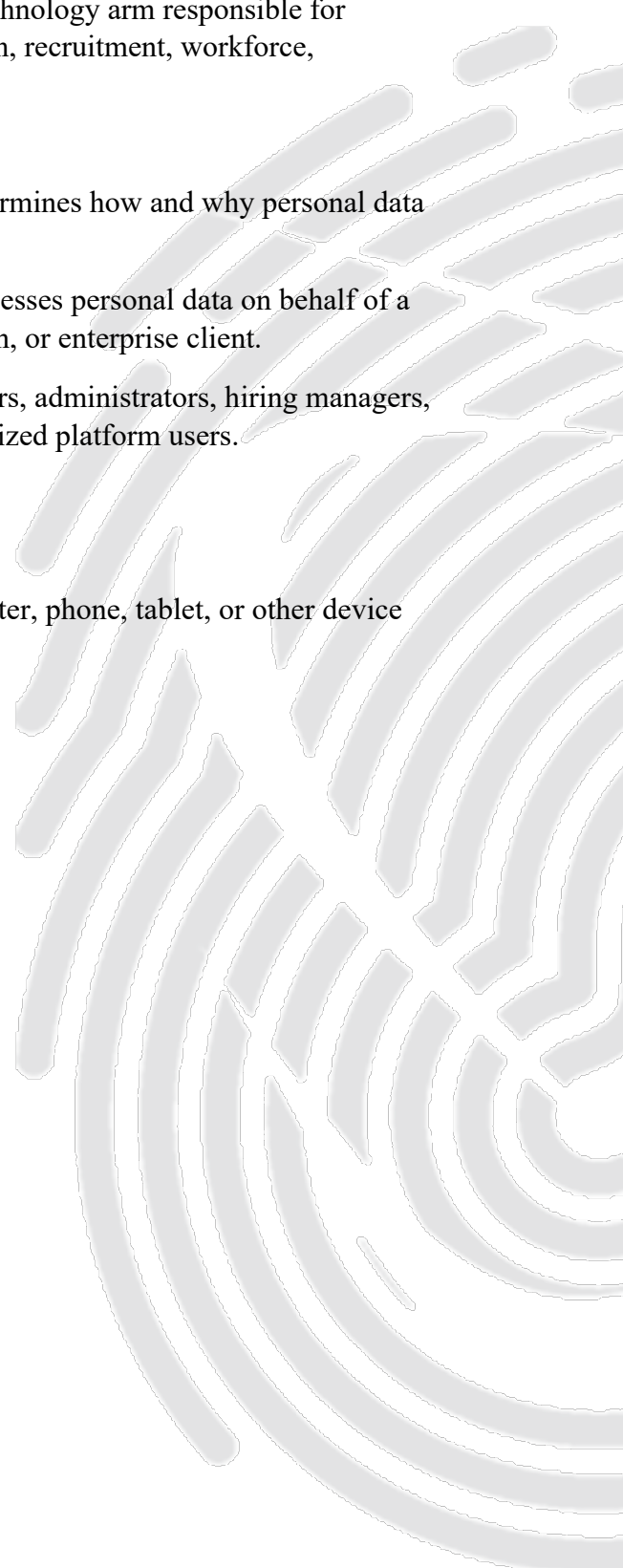
- **Walumo** may act as a data controller where it determines how and why personal data is processed.
- **Walumo** may act as a data processor where it processes personal data on behalf of a customer, employer, recruiter, agency, organization, or enterprise client.
- **Talent Pro users** may include candidates, recruiters, administrators, hiring managers, company representatives, internal staff, and authorized platform users.

3. What Are Cookies and Similar Technologies?

Cookies are small files placed on a user's browser, computer, phone, tablet, or other device when the user visits a website or uses an application.

Similar technologies may include:

- Local storage;
- Session storage;
- Mobile app identifiers;
- SDK-generated identifiers;
- Device identifiers;
- Pixel tags;
- Web beacons;
- Email tracking pixels;
- Push notification tokens;
- Authentication tokens;
- Server-side session identifiers;
- WebSocket connection identifiers;
- Anti-fraud identifiers;
- Security logs;
- Analytics tags;



- AI session identifiers.

These technologies may be temporary or persistent.

A **session cookie or identifier** is usually deleted when the browser or app session ends.

A **persistent cookie or identifier** remains for a defined period unless deleted earlier by the user or by Talent Pro.

4. Why Talent Pro Uses Cookies and Similar Technologies

Talent Pro uses cookies and similar technologies to:

1. Keep users signed in securely;
2. Authenticate users and prevent unauthorized access;
3. Protect the platform against fraud, abuse, cyberattacks, CSRF attacks, account takeover, spam, and misuse;
4. Maintain real-time functionality such as messaging, notifications, interview updates, recruiter alerts, and job application updates;
5. Remember user preferences such as language, country, job market, theme, display settings, and notification settings;
6. Understand platform performance and improve user experience;
7. Analyze onboarding flows and product adoption;
8. Support AI features such as interview coaching, candidate assistance, job matching, profile guidance, and simulated interviews;
9. Process payments, subscriptions, billing, credits, AI token balances, and transaction security;
10. Deliver transactional emails and, where permitted, measure delivery, opening, and click-through activity;
11. Comply with legal, regulatory, audit, security, and contractual obligations;
12. Prepare accurate privacy declarations for app stores and platform partners.

Talent Pro does not use cookies or similar technologies to unlawfully monitor users, secretly profile users, sell user data without proper notice, or bypass user consent requirements.

5. Legal Basis and Consent Approach

Talent Pro applies a high-standard global consent model.

5.1 Strictly Necessary Technologies

Strictly necessary cookies and similar technologies are required for the platform to work. These may be used without prior opt-in consent where allowed by law because they are necessary to provide the service requested by the user.

Examples include:

- Login authentication;
- Session security;
- CSRF protection;
- Account security;
- Fraud prevention;
- Load balancing;
- Real-time session continuity;
- Payment security;
- Consent preference storage.

Users cannot disable strictly necessary technologies through Talent Pro's cookie settings because the platform may not function properly without them.

5.2 Optional Technologies

Optional cookies and technologies are not essential for the platform to operate. These include:

- Analytics;
- Product performance measurement;
- Preference personalization;
- Non-essential AI personalization;
- Email engagement tracking;
- Marketing measurement;
- Cross-platform tracking;
- Third-party advertising or attribution tools, if introduced in future.

Talent Pro will request consent before activating optional technologies in jurisdictions where consent is required.

Where applicable, users will be able to:

- Accept all optional cookies;
- Reject all optional cookies;
- Manage cookies by category;
- Withdraw consent at any time;
- Change preferences without penalty;
- Use the service even after rejecting non-essential cookies, unless a specific optional feature depends on that technology.

6. Cookie and Tracking Categories Used by Talent Pro

Talent Pro classifies cookies and similar technologies into the following categories.

7. Strictly Necessary Cookies and Technologies

These technologies are essential for authentication, security, fraud prevention, session management, and service delivery.

Name / Identifier	Type	Duration	Purpose
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tp_access_token	Strictly necessary	1 hour or shorter	Maintains the authenticated user session and supports secure access to the platform.
tp_refresh_token	Strictly necessary	Up to 30 days	Allows secure renewal of a user session without requiring repeated login.
tp_session_id	Strictly necessary	Session	Maintains session continuity, WebSocket connection, messaging, and real-time notifications.
tp_csrf_token	Strictly necessary	Session	Protects the platform against cross-site request forgery attacks.
tp_consent_status	Strictly necessary	Up to 12 months	Stores the user's cookie and tracking preferences so the user is not repeatedly asked.
tp_security_event	Strictly necessary	Session to 30 days	Supports fraud prevention, suspicious login detection, and account protection.
tp_payment_session	Strictly necessary	Session	Supports secure payment, checkout, subscription, invoice, or billing flow where applicable.

Security Requirements for Strictly Necessary Cookies

Where authentication or security cookies are used, Talent Pro should configure them, where technically possible, as:

- Secure;
- HttpOnly;
- SameSite=Lax or SameSite=Strict, depending on platform needs;
- Encrypted or cryptographically signed;
- Limited in duration;
- Rotated where necessary;
- Protected against unauthorized access;
- Not accessible to unnecessary third-party scripts.

8. Functionality and Preference Cookies

Functionality cookies remember user choices and improve the user experience.

Name / Identifier	Type	Duration	Purpose
tp_locale	Functionality	Up to 12 months	Remembers the user's preferred language, such as English, French, or other supported languages.
tp_country	Functionality	Up to 12 months	Remembers the user's selected country, market, or job location preference.
tp_display_prefs	Functionality	Up to 12 months	Remembers display preferences such as theme, density, layout, accessibility settings, and notification preferences.
tp_timezone	Functionality	Up to 12 months	Helps display interview times, deadlines, and platform events in the appropriate time zone.
tp_saved_filters	Functionality	Up to 12 months	Remembers recruiter or candidate search filters where enabled.

If users disable functionality cookies, Talent Pro may still work, but some preferences may need to be re-entered.

9. Analytics and Performance Cookies

Analytics and performance cookies help Talent Pro understand how the platform is used, identify errors, improve performance, and enhance the user experience.

Name / Identifier	Type	Duration	Purpose
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tp_analytics_id	Analytics / performance	Up to 13 months	Provides a pseudonymous identifier for audience, journey, usage, and performance analysis.
tp_onboarding_step	Analytics / performance	Up to 30 days	Measures progress through onboarding and helps improve user guidance.
tp_feature_usage	Analytics / performance	Up to 13 months	Helps understand which features are used, underused, or causing user difficulty.
tp_error_trace	Performance / diagnostics	Up to 90 days	Helps diagnose technical errors, crashes, failed requests, and system instability.
tp_latency_metric	Performance / diagnostics	Up to 90 days	Measures page speed, API response times, and application performance.

Analytics data may be aggregated, pseudonymized, or anonymized where possible. However, where analytics can reasonably be linked to a user, account, device, or organization, Talent Pro treats it as personal data.

Analytics cookies and similar technologies will not be activated before consent where prior consent is legally required.

10. Artificial Intelligence Cookies and Technologies

Talent Pro may use AI-related technologies to support features such as candidate guidance, interview preparation, simulated interviews, recruiter assistance, job matching, communication support, profile improvement, and workflow automation.

Name / Identifier	Type	Duration	Purpose
tp_ai_session	AI functionality	Session	Maintains the context of an AI coaching, interview, or assistance session.
tp_ai_context_id	AI functionality	Session to 30 days	Links the AI interaction to the relevant session, workflow, or request.
tp_token_balance	Account / AI functionality	Session	Displays available AI token balance, credit entitlement, or usage allocation.
tp_ai_feedback_status	AI improvement / functionality	Up to 90 days	Records whether the user submitted feedback on an AI-generated output.

AI Transparency

Where AI features process candidate, recruiter, employer, profile, message, interview, document, or job application data, those activities must also be explained in the Talent Pro Privacy Policy and Artificial Intelligence Terms.

Talent Pro should not use AI cookies or identifiers to make secret, unfair, discriminatory, or legally significant decisions about a person without appropriate notice, lawful basis, human review where required, and applicable safeguards.

Sensitive Data and AI

Users should avoid entering unnecessary sensitive personal data into AI features unless the platform specifically requests it for a lawful, necessary, and disclosed purpose.

Sensitive data may include information about health, disability, race, ethnicity, religion, political opinion, biometric data, precise location, criminal history, union membership, or other legally protected data depending on the jurisdiction.

11. Communication, Email, and Notification Technologies

Talent Pro may use technologies to deliver and secure platform communications, including:

- Account verification emails;

- Password reset emails;
- Job application confirmations;
- Interview invitations;
- Recruiter updates;
- Candidate pipeline updates;
- Contractual or administrative notices;
- Security alerts;
- Product notifications;
- Support messages;
- Optional marketing communications, where permitted.

Some emails may include pixels or similar technologies to understand whether an email was delivered, opened, or clicked.

Where required by law, Talent Pro will request consent or provide an opt-out for non-essential email tracking or marketing communications.

Transactional and security communications may still be sent even if users opt out of marketing communications.

12. Mobile App Technologies

When Talent Pro is accessed through a mobile application, the platform may use mobile-specific technologies, including:

- App instance identifiers;
- Crash reporting tools;
- Diagnostic logs;
- Device operating system information;

- Push notification tokens;
- Authentication tokens;
- Local storage;
- Secure device storage;
- Mobile SDK identifiers;
- App performance monitoring tools;
- Payment SDKs;
- Social login SDKs;
- Analytics SDKs, where enabled;
- AI SDKs or API connectors, where enabled.

Talent Pro will disclose mobile data collection accurately in Apple App Store privacy disclosures and Google Play Data Safety disclosures.

If Talent Pro introduces tracking for advertising, cross-app tracking, cross-site tracking, advertising measurement, or access to device advertising identifiers, it will request the required operating system permission and will not track users who decline permission.

Talent Pro will not use fingerprinting or device signals to bypass user privacy choices.

13. Third-Party Cookies, SDKs, and Service Providers

Talent Pro may use trusted third-party providers to operate, secure, improve, and deliver the platform.

These may include:

Provider / Category	Purpose
Microsoft Azure	Hosting, infrastructure, secure storage, authentication support, monitoring, and platform security.

SendGrid or similar email provider	Transactional email delivery, email security, and permitted communication analytics.
Payment providers such as Paystack, Flutterwave, M-Pesa, Stripe, or similar providers	Payment processing, fraud prevention, checkout security, billing, subscriptions, and transaction records.
Analytics providers	Product analytics, performance monitoring, user journey analysis, and platform improvement, where enabled and consented to where required.
Authentication providers	Google, LinkedIn, Microsoft, email/password authentication, or other login providers where enabled.
Cloud security providers	Threat detection, bot protection, suspicious activity monitoring, and platform protection.
AI infrastructure providers	AI feature delivery, coaching, interview simulation, job matching, content generation, and workflow assistance where enabled.

Third-party providers may place or access cookies, identifiers, or similar technologies depending on the integration.

Talent Pro requires third-party providers to process data only for authorized purposes and to apply appropriate security and confidentiality measures.

Talent Pro does not control all third-party technologies once a user leaves Talent Pro or interacts directly with a third-party website, payment page, app store, login provider, or external service.

Users should review the privacy notices of third-party providers where applicable.

14. International and Country-Specific Compliance Approach

Talent Pro is designed for multi-country operation. Privacy, cookie, and tracking laws differ across jurisdictions. To reduce risk, Talent Pro applies the following global baseline:

1. Strictly necessary technologies may operate without opt-in where legally permitted.
2. Non-essential cookies and tracking technologies require user choice.
3. No optional analytics, marketing, advertising, or profiling cookies should be activated before consent where prior consent is required.
4. Consent must be clear, specific, informed, affirmative, and capable of withdrawal.

5. Rejecting non-essential cookies must be as easy as accepting them.
6. Users must be able to change preferences at any time.
7. Cookie consent records must be logged for audit purposes.
8. Users must receive clear notice of cookie names, categories, purposes, providers, and retention periods.
9. The platform must respect opt-out mechanisms where legally required.
10. The platform must not use dark patterns, forced consent, hidden tracking, pre-ticked boxes, misleading buttons, or consent walls unless reviewed and approved for the specific jurisdiction.
11. Data collected through cookies must be limited to what is necessary for the disclosed purpose.
12. Retention must be limited and reviewed periodically.
13. Cross-border transfers must be supported by appropriate safeguards.
14. Mobile app store disclosures must match the platform's actual technical behavior.

15. United States Privacy Rights and Opt-Out Controls

For users in the United States, privacy rights may vary by state.

Where applicable, Talent Pro will provide rights and controls that may include:

- Notice at or before collection;
- Access to personal data;
- Deletion of personal data;
- Correction of inaccurate personal data;

- Opt-out from sale of personal data;
- Opt-out from sharing personal data for cross-context behavioral advertising;
- Opt-out from targeted advertising;
- Opt-out from profiling that produces legal or similarly significant effects, where applicable;
- Limitation on use of sensitive personal data, where applicable;
- Recognition of valid opt-out preference signals, where required;
- Non-discrimination for exercising privacy rights.

Talent Pro does not intend to sell personal data in the ordinary meaning of selling data for money. If any activity is considered “sale,” “sharing,” or “targeted advertising” under applicable US state privacy law, Talent Pro will provide the required opt-out mechanism.

Where required, Talent Pro will honor Global Privacy Control or another legally recognized opt-out preference signal.

16. European Union, United Kingdom, and Similar Consent Jurisdictions

For users in the European Union, European Economic Area, United Kingdom, and similar consent-based jurisdictions, Talent Pro applies the following rules:

1. Non-essential cookies and similar technologies will not be activated before consent.
2. Consent will be requested through a clear banner or preference center.
3. Users will be given meaningful choices by category.
4. Consent will not be obtained through silence, inactivity, pre-ticked boxes, or forced acceptance.

5. Users can reject non-essential cookies.
6. Users can withdraw consent at any time.
7. Withdrawal of consent will be as easy as giving consent.
8. The service will not be unfairly denied because a user rejects optional cookies, unless the specific optional feature cannot function without that technology.
9. Consent records will be retained for accountability.
10. Cookie purposes, providers, and durations will be disclosed.

17. Children, Minors, and Young Users

Talent Pro is primarily designed for professional recruitment, employment, hiring, workforce, and career-related use.

Talent Pro is not intended for children below the minimum age required by applicable law.

Where Talent Pro knowingly processes data of minors, Walumo will apply additional safeguards, which may include:

- Parental or guardian consent where required;
- Restricted profiling;
- Restricted marketing;
- Limited retention;
- Stronger default privacy settings;
- Additional review before AI, analytics, or automated processing is applied.

Talent Pro should not use advertising tracking, behavioral profiling, or unnecessary cookies for minors.

18. Cookie Management

Users can manage cookie and tracking preferences in several ways.

18.1 Through Talent Pro

Users can manage preferences through:

Settings → Privacy → Cookie and Tracking Preferences

The preference center should allow users to:

- Accept all optional cookies;

- Reject all optional cookies;
- Manage by category;
- View cookie details;
- Withdraw consent;
- Update consent choices;
- Access the Privacy Policy;
- Access this Cookie Policy;
- Submit privacy requests.

18.2 Through Browser Settings

Users may also control cookies through browser settings, including:

- Google Chrome;
- Mozilla Firefox;
- Safari;
- Microsoft Edge;
- Brave;
- Opera;
- Other supported browsers.

Browser settings may allow users to block cookies, delete cookies, prevent cross-site tracking, or send privacy preference signals.

Blocking strictly necessary cookies may prevent login, session security, messaging, payment processing, or core platform features from working properly.

18.3 Through Mobile Device Settings

Mobile users may control certain permissions through device settings, including:

- Push notifications;
- App tracking permissions;
- Advertising identifier settings;
- Location permissions, where applicable;
- Camera and file permissions, where applicable;

- Microphone permissions, where applicable;
- Background activity permissions;
- App data deletion controls.

Some mobile settings are controlled by Apple, Google, device manufacturers, or operating system providers and may not be controlled directly by Talent Pro.

19. Retention Periods

Talent Pro keeps cookies and similar technologies only for as long as necessary for the purpose for which they were collected.

General retention periods include:

Category	Typical Retention
Session cookies	Until the session ends
Access tokens	1 hour or shorter
Refresh tokens	Up to 30 days
CSRF/security tokens	Session
Consent preference records	Up to 12 months, unless law allows or requires a different period
Functionality preferences	Up to 12 months
Analytics identifiers	Up to 13 months
Onboarding analytics	Up to 30 days
Error and crash logs	Up to 90 days
Payment session identifiers	Session or as required for transaction security
AI session identifiers	Session to 30 days, depending on feature
Audit/security logs	As required for security, legal, contractual, or compliance purposes

Retention periods may be shorter or longer where required for legal, security, fraud prevention, dispute resolution, audit, or contractual reasons.

20. Security Measures

Talent Pro applies appropriate technical and organizational measures to protect cookies, identifiers, and related personal data.

These measures may include:

- Encryption in transit;
- Encryption at rest where appropriate;
- Secure cookie flags;
- HttpOnly flags for sensitive cookies;
- SameSite controls;
- Access controls;
- Token expiry;
- Token rotation;
- Audit logs;
- Rate limiting;
- CSRF protection;
- Authentication controls;
- Multi-factor authentication where enabled;
- Vulnerability management;
- Secure development reviews;
- Monitoring for suspicious activity;
- Vendor due diligence;
- Incident response procedures.

Users are responsible for keeping their login credentials secure and should not share access credentials with unauthorized persons.

21. Automated Decision-Making, Profiling, and Recruitment Use

Talent Pro may use cookies and similar technologies to support product functionality, analytics, candidate workflows, recruiter dashboards, job recommendations, pipeline activity, onboarding, and AI-assisted features.

Where such processing may contribute to profiling, recruitment recommendations, ranking, scoring, or automated decision support, Talent Pro will provide additional information in the Privacy Policy and AI Terms.

Talent Pro should not make final hiring, rejection, employment, or legally significant decisions solely through cookies or hidden tracking technologies.

Human review and organizational responsibility should remain part of recruitment decision-making where required by law or good governance.

22. Cross-Border Data Transfers

Talent Pro may operate across multiple countries and may use service providers located outside the user's country.

Where cookie-related data or similar identifiers are transferred internationally, Talent Pro will apply appropriate safeguards, which may include:

- Data processing agreements;
- Standard contractual clauses;
- Adequacy decisions where available;
- Transfer risk assessments;
- Confidentiality commitments;
- Security controls;
- Access restrictions;
- Data minimization;
- Vendor due diligence;
- Local hosting or regional controls where required.

23. User Rights

Depending on the user's location and applicable law, users may have the right to:

- Be informed about how cookies and similar technologies are used;
- Access personal data linked to cookies or identifiers;
- Correct inaccurate personal data;
- Delete personal data;

- Object to processing;
- Withdraw consent;
- Restrict processing;
- Opt out of sale or sharing;
- Opt out of targeted advertising;
- Opt out of certain profiling;
- Limit use of sensitive personal data;
- Request data portability;
- Lodge a complaint with a data protection authority or regulator.

To exercise rights, users may contact Walumo using the contact details below.

24. App Store and Mobile Platform Disclosures

Talent Pro will maintain accurate disclosures for Apple App Store and Google Play.

24.1 Apple App Store

Talent Pro will disclose collected data types, purposes, whether data is linked to the user, and whether data is used for tracking.

If Talent Pro uses tracking as defined by Apple, Talent Pro will request permission through Apple's App Tracking Transparency framework before tracking the user or accessing the device advertising identifier.

Talent Pro will not use fingerprinting or alternative identifiers to bypass Apple privacy choices.

24.2 Google Play

Talent Pro will complete and maintain the Google Play Data Safety form accurately.

The disclosure will cover:

- Data collected by Talent Pro;
- Data collected by third-party SDKs;
- Whether data is shared;
- Whether data is encrypted in transit;
- Whether users may request deletion;

- Whether collection is required or optional;
- The purposes of collection;
- Security and privacy practices.

Talent Pro is responsible for ensuring that app store declarations match the actual behavior of the app.

25. Changes to This Policy

Talent Pro may update this Policy from time to time to reflect:

- New features;
- New cookies or SDKs;
- New AI functionality;
- New analytics tools;
- New payment providers;
- New communication tools;
- Legal or regulatory changes;
- App store requirements;
- Security improvements;
- Operational changes.

If material changes are made, Talent Pro will provide appropriate notice through the platform, app, email, or another suitable channel.

The latest version will be available through the platform and user account settings.

26. Contact

For questions about this Policy, cookie use, tracking technologies, privacy rights, or data protection matters, users may contact:

Walumo — Data Protection Contact

Email: infowalumo@walumoafrika.com

Where required by law, Walumo may designate a Data Protection Officer, local representative, or privacy contact for specific jurisdictions.

Operational Compliance Checklist for Walumo

Before publishing this Policy or uploading Talent Pro to iOS or Android, Walumo should confirm the following:

Area	Requirement	Status
Cookie banner	Includes Accept All, Reject All, and Manage Preferences	Pending
Consent loading	Non-essential cookies blocked before consent	Pending
Preference center	Available under Settings → Privacy	Pending

Consent logs	Consent choice, date, version, category, and user/device reference recorded	Pending
Cookie inventory	All cookies, local storage, SDKs, pixels, and identifiers mapped	Pending
Third-party SDK review	All SDKs reviewed for data collection and sharing	Pending
Apple privacy label	App Store Connect privacy disclosures completed accurately	Pending
Apple ATT	ATT implemented if tracking or IDFA access exists	Pending
Google Data Safety	Play Console Data Safety form completed accurately	Pending
Privacy Policy	Updated to match cookie, AI, recruitment, analytics, and app data practices	Pending
Terms and Conditions	Updated to reference cookies, AI features, acceptable use, account rules, and third-party services	Pending
AI Terms	Added for AI coaching, simulated interviews, job matching, and automated assistance	Pending
DPA	Data Processing Addendum prepared for employer/recruiter clients	Pending
Security settings	Secure, HttpOnly, SameSite, encryption, rotation, token expiry confirmed	Pending
US opt-out	Do Not Sell or Share / Targeted Advertising opt-out assessed	Pending
GPC	Global Privacy Control handling assessed where applicable	Pending
Minors	Age gate and minors' data handling reviewed	Pending

Cross-border transfers	Transfer safeguards documented	Pending
Retention	Cookie and log retention schedule approved	Pending
Vendor contracts	Data processing terms signed with providers	Pending
Legal review	Reviewed by qualified counsel in priority markets	Pending

