



PUBLIC PRIVACY DOCUMENT

# COOKIE AND ANALYTICS NOTICE

How Luminera uses cookies, security technologies and privacy-focused website analytics

## Luminera (Pty) Ltd

Registration number 2026/556387/07  
English version | Version 1.0 | Approved 30 July 2026

|                     |                                                             |
|---------------------|-------------------------------------------------------------|
| Document owner      | Luminera (Pty) Ltd - Founders                               |
| Date of compilation | 29 July 2026                                                |
| Effective date      | Upon website publication                                    |
| Review cycle        | At least annually and whenever website technologies change  |
| Public status       | Founder-approved on 30 July 2026 for website implementation |
| Classification      | Public privacy document                                     |

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## 1. Purpose and scope

This Cookie and Analytics Notice explains how Luminera (Pty) Ltd ("Luminera", "we", "us" or "our") may use cookies, browser-based security tools, server logs and privacy-focused analytics when a person visits <https://lumineraafrica.com> or uses its public quotation process and private administrative portal.

This Notice should be read with Luminera's Privacy Notice, Website Terms of Use and Quote Request Terms. It describes the intended launch configuration and must be checked against the live website before publication. If the actual technologies or settings differ, the published register must be updated before or when the change is activated.

### Current launch principle

Luminera intends to use only technologies reasonably required for website operation, security, quotation processing, administrator authentication and privacy-focused performance analytics. Luminera does not currently plan advertising, remarketing, behavioural profiling or cross-site advertising cookies.

## 2. What cookies and similar technologies are

A cookie is a small text value that a website or service provider may ask a browser to store and return during later requests. Cookies can support security, session continuity, authentication, preferences, load balancing, fraud prevention and analytics. Cookies may last only for a browser session or for a stated period, depending on their purpose and configuration.

Similar technologies include local storage, session storage, browser identifiers, pixels, scripts, software-development-kit functions, challenge tokens, device or browser signals and server-side logs. A technology can process information even when it does not place a traditional cookie on the visitor's device.

## 3. Luminera's current launch approach

- Strictly necessary cookies or tokens may be used for security, anti-forgery protection, administrator authentication, challenge completion, rate limiting and reliable website operation.
- Cloudflare Turnstile is planned to protect public forms from automated abuse, with server-side validation.
- Cloudflare Web Analytics is planned for privacy-focused page-performance and visitor-count information. Cloudflare states that this product does not use cookies or local storage to collect its usage metrics.
- Standard hosting, application and security logs may record limited technical information such as IP address, browser or user-agent information, date and time, requested page, response status, security events and diagnostic details.
- Luminera does not currently plan Google Analytics, Meta Pixel, advertising networks, remarketing pixels, social-media tracking pixels or personalised advertising cookies.

The final website implementation must be tested before launch. Cookie names can include automatically generated or configuration-dependent suffixes, and a service may change its technical implementation. The live register should therefore identify categories and purposes accurately and list exact names where reasonably stable.

## 4. Strictly necessary and security technologies

Strictly necessary technologies support functions that visitors request or that Luminera reasonably needs to operate and secure the website. These may include anti-forgery protection,

secure form submission, administrator sign-in, session management, prevention of duplicate or abusive requests, load balancing, rate limiting and challenge clearance.

These technologies are not used by Luminera for advertising. Blocking them may prevent a quotation form, security challenge, administrator login or other protected feature from working correctly. Where a technology is essential for the requested service or security, Luminera may use it without offering an on-site opt-out that would make the feature unsafe or unusable, while still providing transparent notice and respecting applicable law.

#### **Administrator portal**

Authentication and session cookies used for Luminera's private admin portal are intended for authorised users only. They may be encrypted, marked Secure and HttpOnly, and configured to expire after inactivity or sign-out. Their exact names and durations will be confirmed during v0.11 launch hardening.

## **5. Cloudflare Turnstile and challenge processing**

Luminera plans to use Cloudflare Turnstile on public forms to distinguish legitimate users from automated abuse. The widget runs browser-side checks and produces a short-lived token. Luminera's server then sends that token to Cloudflare for validation before accepting the protected submission.

Turnstile may process browser, device, network and challenge information needed to assess the request, including technical signals, IP address, user-agent or browser information, hostname, time, challenge outcome and related security metrics. Cloudflare also describes short-lived ephemeral device identifiers that can operate without cookies or local storage.

Turnstile does not necessarily set a cookie in its ordinary configuration. If Cloudflare pre-clearance or another challenge feature is enabled, a `cf_clearance` cookie may be used to store proof that a challenge was passed. Luminera will not enable pre-clearance without confirming the need, settings, duration and published disclosure.

## **6. Cloudflare Web Analytics**

Luminera plans to use Cloudflare Web Analytics to understand website traffic and page performance in aggregate. The service may provide information such as page views, referring sources, countries or regions, browser and device categories, page-load timing and Core Web Vitals or similar performance measurements.

According to Cloudflare's current product documentation, Cloudflare Web Analytics is designed as a privacy-first service, does not collect or use visitors' personal data for the analytics product, does not use cookies or localStorage to collect usage metrics, and does not track individual end users across Cloudflare customers' websites. Luminera will recheck these statements and its chosen settings before publication because service-provider features and documentation may change.

The analytics beacon and supporting requests may still create ordinary network and server records needed to deliver, secure and troubleshoot the service. Those technical records are addressed in Luminera's Privacy Notice and the provider's applicable terms and privacy documentation.

## 7. Cookie and technology register

| Technology / example                                                            | Category                    | Purpose                                                                                                                                                                        | Typical duration                                                                      |
|---------------------------------------------------------------------------------|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| ASP.NET Core anti-forgery token / cookie (name may vary)                        | Strictly necessary          | Helps verify that protected form requests originate from the expected website session and reduces cross-site request forgery risk.                                             | Session or configuration-dependent.                                                   |
| ASP.NET Core administrator authentication / session cookie (name may vary)      | Strictly necessary          | Keeps an authorised admin user signed in securely and supports session expiry, logout and access control.                                                                      | Session or configured inactivity/persistence period.                                  |
| Cloudflare challenge cookies, including cf_clearance where enabled              | Strictly necessary security | Stores proof that a visitor passed a Cloudflare challenge and reduces repeated challenges. Only applies when the relevant challenge or pre-clearance feature is active.        | Configuration-dependent; confirm before launch.                                       |
| Cloudflare bot or rate-limiting cookies such as __cf_bm or _cfuid where enabled | Strictly necessary security | Helps detect automated traffic or distinguish visitors sharing an IP address for configured security and rate-limiting functions.                                              | Feature-dependent; __cf_bm currently expires after 30 minutes of inactivity.          |
| Cloudflare Turnstile token and ephemeral security identifiers                   | Strictly necessary security | Validates protected forms and helps detect automated abuse. Ordinary ephemeral identifiers do not require cookies or local storage.                                            | Short-lived and challenge-dependent.                                                  |
| Cloudflare Web Analytics beacon                                                 | Privacy-focused analytics   | Provides aggregated page-view and performance information. Cloudflare states that it does not use cookies or localStorage for these metrics.                                   | No analytics cookie; provider data retention applies.                                 |
| Application, hosting and security logs                                          | Operational/security record | Records technical events needed for reliability, diagnostics, abuse prevention, incident investigation and audit. This is server-side processing rather than a browser cookie. | Retained only as reasonably necessary under the Privacy Notice and provider settings. |

The register is deliberately conditional where a Cloudflare or ASP.NET feature is not yet enabled or its final configuration is pending. Before launch, Luminera must inspect the live browser storage, response headers, scripts, admin authentication and Cloudflare settings and replace conditional wording with the actual implementation where appropriate.

## 8. Information processed and why

|                                       |                                                                                                                                                                                                                                      |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Website and device information</b> | IP address; browser or user-agent information; device and operating-system category; language; screen or viewport information where provided; requested URL; referring page; date and time; response status; and performance timing. |
| <b>Security information</b>           | Challenge results; tokens; rate-limit events; suspicious request patterns; failed form or login attempts; Cloudflare Ray ID or similar diagnostic identifier; and security-event logs.                                               |

|                                     |                                                                                                                                                                                                                  |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Form and session information</b> | Anti-forgery values, submission timestamps, reference numbers, session state and administrator authentication information where applicable.                                                                      |
| <b>Purposes</b>                     | Operate the site; secure forms and accounts; prevent fraud, spam and abuse; diagnose errors; measure page performance; understand aggregate usage; maintain records; and comply with legal or regulatory duties. |

Luminera will apply data minimisation and will not intentionally use website technologies to collect special personal information or information about children. Visitors should not place sensitive or unrelated information into free-text fields or attachments unless it is specifically and lawfully required for the enquiry.

## 9. Service providers and cross-border processing

Website and security information may be processed by Luminera's hosting, domain, DNS, content-delivery, security, analytics, email, database, backup and technical-support providers. At launch this is expected to include Cloudflare for domain, DNS, content delivery, security, Turnstile and Web Analytics, together with the selected production hosting provider.

These providers may operate infrastructure or personnel outside South Africa. Information may therefore be transferred to, stored in or accessed from other countries. Luminera will limit transfers to what is reasonably necessary and will rely on appropriate provider terms, contractual safeguards, security controls, confidentiality duties or another lawful transfer condition under section 72 of POPIA.

Cloudflare states that some cookie data may by default be processed in data centres in the United States, subject to its privacy and cross-border transfer terms. The exact service configuration and provider documentation should be reviewed before launch and whenever Luminera changes provider or enables a new feature.

## 10. Retention

Cookie duration depends on the technology and configuration. Session cookies usually end when the browser session expires, while security or authentication cookies may last for a configured period. A visitor may also remove cookies earlier through browser controls, although this can interrupt protected features.

Luminera retains application, server, security and analytics records only for as long as reasonably necessary for operation, security, troubleshooting, reporting, legal compliance, dispute management or another legitimate purpose. Provider-controlled records are retained under the provider's settings and terms. Luminera will review and reduce retention where practical and will securely delete or de-identify records when no longer required.

## 11. Visitor choices and browser controls

- Most browsers allow a visitor to view, delete or block cookies, clear site data, restrict third-party cookies and use private-browsing settings.
- Blocking strictly necessary cookies or scripts may prevent protected forms, challenge completion or the private admin portal from working.
- Cloudflare Web Analytics is planned as cookieless analytics, so deleting cookies will not itself disable the analytics beacon. Script-blocking or privacy tools may block the beacon, but may also affect website functionality.

- A visitor may contact Luminera to ask what information is held, object to or request restriction of certain processing, or request correction or deletion where applicable under POPIA and the Privacy Notice.

Browser instructions differ by product and version. Visitors should consult the help or privacy settings for their browser or device. Luminera cannot guarantee that a browser control will block every server-side log, security check or provider request needed to deliver the website.

## 12. Future non-essential technologies

Luminera will not activate advertising, remarketing, behavioural-profiling, social-media tracking or another non-essential technology without first assessing its purpose, legal basis, privacy impact, provider terms, cross-border implications and consent requirements.

Where prior consent is legally or operationally required, the technology should remain disabled until the visitor actively chooses it. Consent should be specific, informed, freely given where required, easy to withdraw and recorded appropriately. Rejecting a non-essential technology should not prevent access to ordinary public content.

### Change-control requirement

Before adding Google Analytics, Meta Pixel, embedded marketing tools, session recording, personalised advertising, chat tracking or similar technology, Luminera must update this Notice, the live technology register, the Privacy Notice and any consent control before the feature is enabled.

## 13. Third-party websites and embedded content

The website may link to manufacturer, supplier, regulator, social-media or other third-party websites. A link does not mean that Luminera controls the third party's cookies, analytics or privacy practices. Visitors should review the third party's own notices before using its website or service.

Luminera does not currently plan to embed third-party social-media feeds, advertising widgets or video players that set non-essential cookies automatically. If embedded content is added, it must be assessed and disclosed before publication and, where appropriate, loaded only after the visitor makes a choice.

## 14. Security, limitations and incident handling

Luminera will use reasonable technical and organisational safeguards appropriate to its size, systems and risk profile. Planned controls include HTTPS, secure and HttpOnly cookies where applicable, anti-forgery validation, server-side Turnstile verification, rate limiting, restricted administrator access, two-factor authentication, logging, updates, backups and monitoring.

No browser, cookie, analytics or security system can guarantee complete protection or uninterrupted operation. Luminera will investigate suspected security compromises, contain risk, preserve appropriate evidence and make notifications where required by law. Visitors should report suspected misuse or unexpected website behaviour using the contact details below.

## 15. Relationship to the Privacy Notice

This Notice focuses on website technologies. Luminera's Privacy Notice provides the broader explanation of the personal information it processes, purposes, legal grounds, recipients, overseas transfers, retention, security safeguards, data-subject rights and complaint process. Where this Notice and the Privacy Notice address the same processing, they should be read together.

Submitting a quotation request also involves the Quote Request Terms and the privacy acknowledgement shown with the form. A cookie choice is not a substitute for the separate information and agreement needed for a quotation request.

## 16. Updates and contact details

Luminera may update this Notice when the website, provider, security configuration, analytics method, legal requirements or business operations change. The latest published version will show its version and effective date. Material changes should be reviewed by both founders and reflected in the live technology register before or when they take effect.

|                                  |                                                                     |
|----------------------------------|---------------------------------------------------------------------|
| <b>Responsible party</b>         | Luminera (Pty) Ltd                                                  |
| <b>Information Officer</b>       | Michael Bester - Director and Operational Head                      |
| <b>Privacy and general email</b> | info@lumineraafrica.com                                             |
| <b>Telephone / WhatsApp</b>      | 078 909 7747                                                        |
| <b>Website</b>                   | <a href="https://lumineraafrica.com">https://lumineraafrica.com</a> |
| <b>Public location wording</b>   | Based in South Africa                                               |

The full registered address is available in Luminera's PAIA Manual and official compliance records. It is not required in the ordinary website footer or general contact wording.

## 17. Approval and version control

|                              |                                                                                 |
|------------------------------|---------------------------------------------------------------------------------|
| <b>Document</b>              | Luminera Cookie and Analytics Notice 2026 - English                             |
| <b>Version</b>               | 1.0                                                                             |
| <b>Compilation date</b>      | 29 July 2026                                                                    |
| <b>Status</b>                | Founder-approved on 30 July 2026 for website implementation                     |
| <b>Founders</b>              | Michael Bester and Damian Nel                                                   |
| <b>Approval</b>              | Approved by Michael Bester and Damian Nel on 30 July 2026                       |
| <b>Next scheduled review</b> | At least annually, and immediately before or after a material technology change |

### Pre-publication verification

Before publication, inspect the live website with browser developer tools and Cloudflare/hosting dashboards. Confirm exact cookies, scripts, storage, durations, Turnstile settings, Web Analytics settings, admin authentication, consent controls and provider links. Update this document if the live configuration differs.

## Official reference note

This Notice was prepared with reference to the Protection of Personal Information Act 4 of 2013, the Electronic Communications and Transactions Act 25 of 2002, and official Cloudflare documentation for Web Analytics, Turnstile and Cloudflare cookies as available on 29 July 2026. Provider features and legal requirements may change. This document is practical compliance drafting and does not replace advice from a South African attorney or privacy professional.