Data Candy (UK) Limited T/A SmartTrace Cookie Policy

Last Updated: 21 September 2021

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

There are different **types** of cookies, some of which are classified according to their *lifespan* (for example session cookies and persistent cookies) and others which are based on the *domain* (that is the URL) to which the cookie belongs (referred to as, for example, first-party and third-party cookies). Some are necessary for the proper functioning of the website, while others can be used to collect information for online targeted advertising and marketing. For more information on the cookies we use on our website and the purposes for doing so, please read on.

<u>Lifespan</u>

Session cookies

These expire and are deleted at the end of a browser session, that is, from when you open the browser to when you exit it. They allow website operators to link your actions during a single browser session to allow you to use the website most efficiently. For example, session cookies enable a website to remember that you have placed items in an online shopping basket. They could also be used for security when you are accessing internet banking. As these cookies are not generally stored beyond the browser session, they are usually considered less privacy-intrusive than other types of cookies and are less likely to constitute personal data.

Persistent cookies

These are stored on your terminal equipment between browsing sessions, until they reach a defined expiration date (which can be minutes, days or several years in the future). They therefore enable the website to "recognise" you on your return, to remember your preferences and to tailor services to you. They may also be used to track your browsing activity across different websites and to build up a detailed profile of your browsing behaviour for use in

targeted advertising. For this reason, persistent cookies are generally considered to be more privacy-intrusive than session cookies. They are sometimes referred to as "tracking cookies".

Provenance: we use first-party cookies and third-party cookies on this website.

First-party cookies

Whether a cookie is "first" or "third" party refers to the website or the domain placing the cookie. First-party cookies are placed by our website when you visit it. This means assigning a unique identity to you by setting the cookie to either your browser and or your hard drive with a view to tracking your journey on the website. First-party cookies are commonly used for session management, personalisation and recognition purposes, where the information the cookie transmits is later combined with the personal information you have supplied to the website in the course of a sale or other contact. After it's been placed, your cookie is retrieved each time you visit our website, making it unnecessary to re-enter registration data on each visit, and giving you, for example, the ability to store items in an electronic shopping basket between visits.

You can block first-party cookies by adjusting your browser settings. However, please be aware that this may lead to a loss of functionality of the site.

Third-party cookies

Third-party cookies are cookies planted by parties, other than by our website operator (as defined by the URL placed in the address bar of the browser). It usually happens when the website incorporates images, social media plugins or advertising from other sites, as these can set cookies as well. It also includes cookies set by third-party adtech providers.

As with first-party cookies, you can block third-party cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

Purpose: we use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- Targeting cookies. These cookies record your visit to our website, the pages you
 have visited and the links you have followed. We will use this information to make
 our website and the advertising displayed on it more relevant to your interests. We
 may also share this information with third parties for this purpose.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

- Performance cookies. These allow us to recognise and count the number of visitors
 and to see how visitors move around our website when they are using it. This helps
 us to improve the way our website works, for example, by ensuring that users are
 finding what they are looking for easily.
- Marketing cookies. These track your online activity to help advertisers deliver more relevant advertising or to limit how many times you see an ad. These cookies can share that information with other organizations or advertisers. These are persistent cookies and almost always of third-party provenance.

Please note, these are the main ways of classifying cookies, although there are cookies that will not fit neatly into these categories or may qualify for multiple categories.

Our Use of Cookies

Our primary purpose of using cookies is to make our website work more effectively to produce statistics and provide the best experience by remembering what options you have clicked on during your visit. We will retain and evaluate information on your recent visits to our website and how you move around different sections of our website for analytics purposes, to understand how people use our website so that we can make it more intuitive. The information also helps us understand which parts of this website are most popular and to measure interest in and use of the various areas of our website. This then allows us to improve our website and the way we market our business.

We also use cookies to personalise content and ads, to provide social media features and to analyse our website traffic. Information on your use of our website may be shared with our social media, advertising and analytics partners; these third-party services (e.g. Google Analytics) may combine the information with other information that you have provided to them or that they have collected from your use of their services.

We may also use other third-party cookies, which are likely to be analytical, performance or targeting cookies) to assist with analysing performance on our website. This information may also be used to help us to improve, administer and diagnose problems with our server and website. The information also helps us monitor traffic on our website so that we can manage our website's capacity, efficiency and security. However, please note, we do not have control over third-party cookies. The parties listed under the heading 'Third Parties' below are the third parties that may also use cookies. To deactivate the use of third-party advertising cookies, you may visit our consumer page to manage the use of these types of cookies.

This information is put together ('aggregated') and provides general and not individually specific information. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. None of this information is therefore associated with you as an individual and the cookie-related information is not used to identify you personally. It is therefore anonymised and 'de-identified' so that it is no longer Personal Data.

We use **strictly necessary** and **functionality** cookies to make our site work. We would also like to set **preference**, **targeting** and **marketing** cookies to help us improve it.

Our site will not set optional cookies unless you enable them, using a tool that will set a cookie on your computer / mobile device to remember your preferences.

The legal bases we rely on for our use of cookies are:

- our legitimate business interests: namely monitoring and improving our website and the proper protection of our business against risks, with respect to all cookies we use; and
- your consent when you agree to accept cookies that are not strictly necessary.

Your Consent and Disabling of Cookies

We can store cookies on your device if they are strictly necessary for the operation of this site (i.e. Strictly necessary cookies, as described above). For all other types of cookies, we need your permission (consent). Except for essential cookies, all cookies will expire after 30 days.

Cookies can be removed in two ways: automatically, when they expire, or when you manually delete them. As stated above, we have no control over third-party cookies, as most web browser software is set up to initially enable cookies. However, you should be able to amend your web browser / device settings in order to:

- Delete all cookies:
- Allow all cookies;
- Block third-party cookies;
- Clear all cookies when you close the browser;
- Open a 'private browsing' / 'incognito' session, which allows you to browse the web
 without recording your browsing history or storing local data such as cookies (you should
 however be aware of the limitations of this feature in a privacy context); and
- Install add-ons and plugins that extend browser functionality.

Since each browser is different, you will need to refer to the guidance documentation for your preferred web browsing platforms in order to control such settings. If you have any further questions regarding disabling cookies, you should consult with your preferred browser's provider or manufacturer.

You can also prevent cookies from being set on a website where you withhold or remove your consent. If you do not want to accept any cookies, you may be able to change your browser

settings so that cookies (including those which are essential to the services requested) are not accepted. Additionally, you can at any time change or withdraw your consent in respect of this website from the cookie declaration on our website. If you have any issues with removing your consent please contact us on the details provided in our <u>Privacy Policy</u>. It may be necessary to refresh the page for the updated settings to take effect.

In order to implement your objection it may be necessary to install an opt-out cookie on your browser. This cookie will only indicate that you have opted out. It is important to note, that for technical reasons, the opt-out cookie will only affect the browser from which you actively object. If you delete the cookies in your browser or use a different end device or browser, you will need to opt out again.

NB! When you remove your consent for cookies, or set your browser setting to disable these, you may lose some of the functionality of our website. Additionally, you may have to manually adjust some preferences every time you visit an Internet site and some services and functionalities may not work if you do not accept the cookies they send.

For further information on cookies generally, including how to control, manage and disable them visit the guidance on cookies published by the UK Information Commissioner's Office: https://ico.org.uk/for-organisations/guide-to-pecr/guidance-on-the-use-of-cookies-and-similar-te-chnologies/, www.aboutcookies.org or https://www.allaboutcookies.org.

Additional Information

We may use other technologies (such as web server logs) on our website to enhance your experience and to collect information about how our website is used. The placing of these technologies (including cookies) on your device may enable you to be identified across multiple websites and online services. Such technologies include:

Pixels tags: Also called clear GIFs, web beacons, or pixels, pixel tags are small pieces of code that can be embedded on websites and emails. Pixels tags may be used to learn how you interact with our website pages and emails; this information helps us, and our partners, to provide you with a more tailored experience.

Device Identifiers: A device identifier is a unique label that can be used to identify a mobile device. Device identifiers may be used to track, analyse and improve the performance of the website and ads delivered.

Browser web storage: This enables websites to store data in a browser on a device. This makes data retrievable even after a browser has been closed and reopened.

Application data cache: This is a data repository on a device. It can, for example, enable a web application to run without an Internet connection and improve the performance of the application by enabling faster loading of content

Server logs: These are pieces of code stored on web servers that automatically record the page requests made when you visit a website. They typically include your web request, Internet Protocol (IP) address, browser type, browser language, the date and time of your request, and one or more cookies that may uniquely identify your browser.

Third Parties

Google Analytics

This website uses Google Analytics, a web analytics service provided by Google. Google Analytics tracks your preferences and identifies popular sections of our website. Use of Google Analytics in this way enables us to adapt the content of our website more specifically to your needs and thereby improve what we can offer to you. Cookie-related information is not used to identify you personally, and what is compiled is only aggregate data that tells us, for example, what countries we are most popular in, but not that you live in a particular country or your precise location when you visited our website.

Google Analytics, its purpose and function is further explained on its website: https://www.google.com/analytics.

To opt out of being tracked by Google Analytics across all websites, Google has developed the Google Analytics opt-out browser add-on. If you would like to opt out of Google Analytics, you have the option of downloading and installing this browser add-on, which can be found under the link: http://tools.google.com/dlpage/gaoptout.

Other websites

Throughout our website we may link to other websites owned and operated by certain trusted third parties to make additional products and services available to you. Advertisers and business partners that you access on or through our website may also send you cookies. We do not control any cookies outside of our website. These other third-party websites may also use cookies or similar technologies in accordance with their own separate policies. For privacy information relating to these other third-party websites, please consult their policies as appropriate. We are not responsible for the privacy policies and practices of other organisations and you should check with the relevant organisation as to how they manage Personal Data and any updates they may make to their privacy and cookie policies, notices and practices.

Changes to this Cookie Policy

We may make changes to this Policy from time to time. When we do so, we will notify those who have a business relationship with us, have an online account with us, or who are subscribed to our emailing lists directly of the changes, and change the 'Last Updated' date above. Any amended policy will be effective immediately on the date stated therein.

We encourage you to review this Policy whenever you access or use our website to stay informed about our information practices with respect to cookies and similar technologies and

the choices available to you. Similarly, our <u>Privacy Policy</u> may also be updated from time to time. If you do not agree to such revised policies, you should discontinue your use of our website. By continuing to access or use our website after the effective date of a change, you confirm your acceptance of any revised cookie and/or privacy policies.

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Google Analytics

This website uses <u>Google Analytics</u>, a web analytics service provided by Google. Google Analytics tracks your preferences and identifies popular sections of our website. Use of Google Analytics in this way enables us to adapt the content of our website more specifically to your needs and thereby improve what we can offer to you. Cookie-related information is not used to identify you personally, and what is compiled is only aggregate data that tells us, for example, what countries we are most popular in, but not that you live in a particular country or your precise location when you visited our website.

Google Analytics, its purpose and function is further explained on its website:

https://www.google.com/analytics

To opt out of being tracked by Google Analytics across all websites, Google has developed the Google Analytics opt-out browser add-on. If you would like to opt out of Google Analytics, you have the option of downloading and installing this browser add-on, which can be found under the link:

http://tools.google.com/dlpage/gaoptout

Other websites

Throughout our website we may link to other websites owned and operated by certain trusted third parties to make additional products and services available to you. Advertisers and business partners that you access on or through our website may also send you cookies. We do not control any cookies outside of our website. These other third-party websites may also use cookies or similar technologies in accordance with their own separate policies. For privacy information relating to these other third party websites, please consult their policies as appropriate. We are not responsible for the privacy policies and practices of other organisations and you should check with the relevant organisation as to how they manage Personal Data and any updates they may make to their privacy and cookie policies, notices and practices.

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We encourage you to review this Policy whenever you access or use our website to stay informed about our information practices with respect to cookies and similar technologies and the choices available to you. Similarly, our <u>Privacy Policy</u> may also be updated from time to time. If you do not agree to such revised policies, you should discontinue your use of our website. By continuing to access or use our website after the effective date of a change, you confirm your acceptance of any revised cookie and/or privacy policies.