

SmartTrace Cookie Policy

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To access this Policy online please visit: <https://smartrace.org.uk/cookie-policy.pdf>

1. Introduction & Scope of this Cookie Policy

Data Candy Limited, trading as “SmartTrace” is committed to protecting the privacy of our customers and stakeholders, and we take our data protection responsibilities with the utmost seriousness.

This Cookie Policy sets out how our website uses cookies and similar technologies on our website and the purposes for which we do so. It applies to all users of our website <https://smartrace.org.uk>, whether you are a customer or user of our services, or just browsing.

We have designed our website so that you may navigate and use it without having to provide Personal Data, subject only to certain data that may be collected via the use of cookies, or data you provide if you wish to access and use our services. This Policy should therefore be read together with our **Privacy Policy**, which provides important information on how who we are and how we manage Personal Data. Our **Privacy Policy** can be accessed at: <https://smartrace.org.uk/privacy-policy.pdf>. Terms defined in our **Privacy Policy** shall have the same meaning in this Cookie Policy.

We ask that you please read our Privacy Policy before providing us with any information about you or any other person. If you do not accept these policies, you should immediately discontinue your use of our website.

2. Who we are

In this Policy, “we”, “us” and “our” refers to Data Candy Limited, trading as “SmartTrace”; a company incorporated in Gibraltar (Company Registration Number 115975) with its registered address at 13/1 Line Wall Rd, Gibraltar, GX11 1AA. Further information on our business, and how to contact us is provided in our **Privacy Policy** (link above).

The terms “you” and “your” includes our customers/clients, business partners and users of our website.

3. What are cookies?

Cookies are a feature of web browser software that allows web servers to recognise the computer or device used to access a website. A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

Information that is initially obtained by a cookie may not personally identify a user until it becomes linked to other information (such as a username). Where the linking of cookie information with other data results in the ability to identify a user, this will be Personal Data and it will be subject to our **Privacy Policy** (link above).

A cookie can be classified by its lifespan and the domain to which it belongs.

By lifespan, a cookie fall into types of classification:

- **Session cookies** allow websites to keep track of user movements from page to page. It is a way of linking the actions of a user during a browser session in order to enhance and speed up the experience. Session cookies are used, for example, to remember what a user has put in his shopping basket. They expire and are erased after a browser session ends and, for this reason, are not regarded as being as privacy intrusive as persistent cookies.
- **Persistent cookies** are saved to the hard drive/storage device and remains on the user's computer or mobile device for a pre-defined period of time. They are designed to allow websites to remember user information and settings for when they visit again (e.g. user name and password, language selection, menu preferences). This speeds up access to the website (e.g. since users do not have to select their preferences or log in every time) and enhances the user experience. Persistent cookies are more privacy intrusive than session cookies since they do not expire at the end of a browser session.

As for the domain to which it belongs, cookies are either:

- **first-party cookies**, which are set by the web server of the visited page and share the same domain (i.e. set by us); or
- **third-party cookies**, which are set by another website or server, on a different domain to the visited page's domain.

Cookies can also be classified by their functionality:

- **Necessary cookies** help make a website usable by enabling basic functions like page navigation and access to secure areas of the website (e.g. allowing you to place items in an online shopping 'cart' / 'basket'). The website cannot function properly without these cookies. Many types of session cookies will fall into this category.
- **Preference/targeting cookies:** Preference cookies enable a website to remember information that changes the way the website behaves or looks. Preference cookies may:
 - Enables cookie consent across multiple websites
 - Remembers the user's selected language version of a website
 - Anonymously record settings for the user's preferences when browsing (e.g. website size/display settings)
- **Statistic cookies** help website owners to understand how visitors interact with websites by collecting and reporting information anonymously. These cookies record your visit to our website, the pages you have visited and the links you have followed, as well as time spent on our website, and the websites visited just before and just after our website. 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. Statistic cookies may also:
 - Register the date and time for the user's latest visit to the website
 - Log internet address linking to our website
 - Send data to third parties (e.g. Google Analytics) about the visitor's device and behaviour
 - Tracks the visitor across devices and marketing channels
 - Registers statistical data on visitors' behaviour on the website for internal analytics by the website operator (e.g. time spent on each page, links clicked,
 - Assign unique ID that identifies the user on recurring visits (usually anonymising or pseudonymising Personal Data)
 - Record website traffic from a particular region/area
 - Log type of operating system, browser type, mobile network information, and Internet Protocol (IP) address (usually masking the last digits so you cannot be identified)
- **Security cookies** are used to authenticate users, prevent fraudulent use of login credentials and protect user data from unauthorised parties. For example, Google LLC ("Google") uses cookies called 'SID' and 'HSID' which contain digitally signed and encrypted records of a user's Google account ID and most recent sign-in time. The combination of these two cookies allows it to block many types of attack, such as attempts to steal the content of forms that users complete on web pages. Such cookies ensure the long-term viability of our information technology systems and website technology, and provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

- **Marketing cookies** are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers. Marketing cookies may:
 - Deliver a series of advertisement products such as real time bidding from third party advertisers (e.g. used by Facebook)
 - Report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user
 - Estimate a user's bandwidth on pages with integrated videos, and store the user's video player (e.g. YouTube) preferences.

Where cookies do not fall into a particular categorisation above, they may be labelled “unclassified” or “pending” whilst the website owner confirms the functionality with the provider of the individual cookie.

4. The cookies we use and why

We use first-party cookies and third-party cookies on this website.

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 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.

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 necessary and security cookies to make our site work. We would also like to set preference, statistics and marketing cookies (sometimes grouped together as “analytics” 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 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 agreeing to accept cookies that are not strictly necessary.

5. Your consent and removing cookies

We can store cookies on your device if they are strictly necessary for the operation of this site (i.e. “Necessary cookies” as described above). For all other types of cookies, we need your permission (consent).

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

- delete all cookies;
- block 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 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 **Privacy Policy** (link above). 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.

Please be aware that where 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/your-data-matters/online/cookies/>), www.aboutcookies.org or www.allaboutcookies.org.

6. Additional Information

6.1. Other technologies

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 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 re-opened.
- **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.

6.2. 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 have 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>.

6.3. 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.

6.4. Changes to this Cookie Policy

We may make changes to this Policy from time to time. Where 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 **Privacy Policy** (link above) 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.**