

Policy Document Title:	UK Cookies Policy
Department:	Operations - UK
Date of Approval:	01.09.2019
Version:	1.0
Policy Author:	Mark Bracken
Policy Owner:	Mark Bracken
Previous Review Date:	31.08.2019
Next Review Date:	31.08.2020
Key Policy Criteria:	This document sets out our policy in respect of the use of cookies within our UK website: www.swishfund.co.uk and covers key criteria for both the customer and Swishfund.
	As is common practice with almost all professional websites, our website uses cookies, which are tiny files that are downloaded to a customers computer to improve their experience. This policy details what information they gather, how we use it and why we sometimes need to store these cookies. This policy also details how a customer can prevent these cookies from being stored.
	The policy is designed to clearly state the legal requirements incumbent upon us when customers are utilising our website to submit applications for credit.
	As a financial lending institution, it is imperative that we have a clear and robust policy in place which details how we operate and utilise cookies within our UK website during the course of our normal business activities. Swishfund complies with all data protection legislation and GDPR requirements and this policy is designed to ensure we maintain the highest standards in this regard at all times.

#### 1. POLICY STATEMENT

- 1.1 The purpose of this document is to help to ensure that we have a clear, robust and effective policy in respect of the use of cookies within our UK website to ensure we support and enhance the customer's experience when using our website to apply for credit.
- 1.2 As we continually strive to be a highly transparent lending institution, we ensure that our customers are able to obtain details of how we use cookies at all times through the provision of this policy on our website. A customer friendly version of this policy can be found here: https://www.swishfund.co.uk/wp-content/uploads/2018/08/180717-Cookies-Policy-Swishfund-UK-Limited.pdf
- 1.3 This policy is reviewed on an annual basis to ensure it remains fully legally compliant in respect of all current and future UK legislation, and to ensure this policy is updated on a regular basis to reflect how cookies are used within our website and the wider UK economy.

## 2. WHAT ARE COOKIES?

- 2.1 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.
- 2.2 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.
- 2.3 We use cookies for a variety of reasons which are detailed within this policy. In most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to a website.



2.4 It is recommended that customers leave all cookies on if they are unsure as to whether they need them or not, in case they are used to provide a service that the customer doesn't use.

### 3. THE COOKIES WE SET

- **3.1** If a customer creates an account with Swishfund we will use cookies for the management of the signup process and general administration of that customer's loan application.
- **3.2** These cookies will usually be deleted when the customer logs out, however, in some cases they may remain afterwards to remember the customer's site preferences when logged out, so that it enhances their experience should they log back in.

### 4. HOW WE USE COOKIES

- 4.1 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.
  - Analytical or 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.
  - 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).
  - **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.

# 5. THIRD PARTY COOKIES

- 5.1 In some special cases we also use cookies provided by trusted third parties. This section details which third party cookies a customer might encounter through our website.
- 5.2 Please note that the following third parties may also use cookies, over which we have no control. These named third parties may include, for example, advertising networks and providers of external services like web traffic analysis services

Cookie Title	Purpose
Google Analytics	Collects statistical information for helping us to
	understand how our customers use our website and
	ways that we can improve the customer experience.
Google Tag	Used for tracking and analytics
Manager	
Vimeo scripts	Contains data on visitor's video-content preferences
LinkedIn script	Used by the social networking service, LinkedIn, for
	tracking the use of embedded services,
Slaask	To optimize the chat-box function on the website.

5.3 To deactivate the use of third-party advertising cookies, you may visit the consumer page to manage the use of these types of cookies.



## 6. DISABLING COOKIES

- 6.1 You may refuse to accept cookies by altering the settings on your internet browser. For more information about how to do this, look at your browser 'help' section or visit <u>www.allaboutcookies.org</u>
- 6.2 Please note that if you adjust your internet browser settings to refuse the setting of cookies, you may not be able to access or use fully certain parts or functionality of the website.