COOKIE AND TECHNOLOGICAL NOTE

"Cookies are at a tenuous yet crucial crossroad between public policy and technology"
http://www.allaboutcookies.org/

Updated EU regulations require to provide site visitors with:
- a description of cookies (that can be found hereinafter in Part 1) and
- a policy that explain how they are truthfully used on this website (that can be found in Part 2).

The regulations also require site visitors to consent to cookies being stored on their computer, laptop or mobile device.

Part 1 – General Description

<u>What is a cookie?</u>

A cookie is a small text file that is created and stored on visitors web browsing device by any website (or certain functional elements of a website). Thus only the site (or function) that created the cookie can retrieve or read the contents within it. When visitor re-visit a website that uses cookies, it will check for its cookies on visitor device and read the information within them. Depending on the purpose of the cookie, the website will usually use that information to *tailor* itself to suit visitors. Each cookie contains anonymous information (typically a unique identifier, the site name, and some digits and numbers), and is specific to visitor's web browser. Cookies can be used for a wide variety of tasks, such as storing site preferences, enhancing navigation between pages and improving user experience. Cookies help make the interaction between user and the website simpler, smoother and more intuitive. Without cookies or similar technologies, sites would not easily be able to "remember" who has previously visited them – logging into a website or adding items to a shopping basket would be much more complicated.

<u>How many types of cookies?</u>

a) Depending on the creating party.

Cookies can be created by the main website that is visited (first party cookies), or by other websites that are contributing (or *feeding*) content to the page visitor is viewing (third party cookies).

First party cookies are created, governed and accessed only by the main website you are visiting.

Third party cookies are created, governed and accessed by external websites that are contributing content or functionality to the main website. The third party organisation responsible for these cookies may use them to track visitor journey or store preferences across multiple websites.

Examples of typical third party content or functionality that may deploy their own cookies:

- user access tracking from external analytics companies, such as Google Analytics;

- embedded videos from sites such as YouTube or Vimeo;

- social sharing options from sites such as Facebook and Twitter;

- content "feeds" from sites such as Flickr and Twitter.

Websites also use third party advertising services to deliver targeted advertising – and some of these advertising services use cookies to track browsing across multiple sites to assess which advertisements should be displayed to each visitor. Third party cookies are not, by default, governed or controlled by the first party website – setting cookie preferences on the website itself will only affect the deployment of first party cookies and not third party cookies.

To manage third party cookies, visitor should check the relevant third party website for advice. (Alternatively, visitor can use browser settings to control the deployment of third party cookies).

b) A note about Flash cookies

Adobe Flash Player is commonly used to deliver media rich content, such as video and interactive entertainment. Adobe deploy their own third party cookies for use by the Flash Player and these are not manageable through the normal browser settings. Flash cookies work in a different way to standard web browser cookies, and are not stored within the browser.

c) Depending on the lifespan.

Cookies are given a lifespan when they are created. Therefore, they will either exist for the duration of a unique visit on the website (session cookies), or they will exist for a defined period after the visit (persistent cookies) so that they are available

if visitor returns to the site. Session cookies are temporary and only exist during browsing session. Once the browser is closed, they are deleted from the browsing device.

Session cookies are used for features like:

- remembering the contents of a shopping basket;
- ensuring uninterrupted but secure access to user accounts (for example, internet banking and email).

Persistent cookies are semi-permanent and they are saved to the browsing device for a fixed period (which could be a month, a year, or longer), and are retained when the browser is closed.

Persistent cookies are used for features like *remembering* a user and their preferences across multiple browsing sessions.

d) Categorization of cookies depending on the purpose.

1. Strictly necessary cookies enable websites to provide certain core features or functions that are expected/requested. Provide features or functionality that are specifically requested/required (for example, enabling visitors to navigate through the site). Without these cookies, the website would not be able to provide site visitors with the service that they expect or need. Features such as automatic sign in (which is typically requested using a "remember me" option) would use a strictly necessary cookie. If browser settings are used to deactivate strictly necessary cookies, the website may become unusable. At the very least, it will no longer be possible to guarantee security or predict how the website will perform.

2. Performance orientated cookies improve the performance of the site, and the experience of the user. Performance cookies help to improve user experience on a website and can include those that collect information about how a visitor interacts with the website. These cookies do not collect any information that could be used to identify the visitor, or that could be used for marketing/advertising purposes. The collected information is anonymous and used only to improve the relevant organizations understanding of how the website works, how effective it is at presenting its content and to help improve the understanding of what its visitors require.

3. Cookies that enhance the features, functionality and user experience are classed as functionality cookies. These can include those that store details of visitor preferences about the specific site, allowing it to "remember" visitor and ensure that, when is chosen a specific option on the site, that choice is retained for each visit. If visitor has requested that content be tailored to his/her requirements, it is possible that a functionality cookie has been used to record this preference (for example, specifying location to receive information specific to visitor's area).

4. Targeting orientated cookies enable websites to target advertising, marketing or other content based on the location and/or browsing habits (among others) of the user. This cookies that attempt to automatically tailor content based on the visitors journey and interactions on a website. Targeting cookies are typically used for marketing and advertising purposes, delivering content which is relevant to the visitors' interests and their browsing habits. Targeting cookies are often governed by third party services.

<u>Further information</u>

The Information Commissioner's Office (ICO) is responsible for monitoring and enforcing the EU cookie regulations. The ICO website features a guide to the directive and various aspects of cookies.

The *All About Cookies* website is a free resource for marketers and consumers which explains what cookies are and how they are used.

Part 2 – Use of cookies by Advertising (ADV) Companies on Network Sites (Noatel Europe Limited Sites)

Even if the Site Operator is **Noatel Europe Limited** the cookies are created, governed and accessed by Advertising Companies.

The use of our cookies and third party cookies to improve our services, obtain statistics, display navigation-based advertising, and to facilitate your interaction with social networks. By continuing to navigate you consent to the drop on your device and the use of cookies by advertising Companies. All the information on our cookie policy and changing your browser settings instructions are available hereinafter. This COOKIE AND TECHNOLOGICAL NOTE represents the **official Cookie Policy**. We provide notice of and a link to this document in the footer of each page of this website. By using and continuing to use this website and its features, you agree that we (and the third-party advertisers on this website) can place performance cookies on your device.

The cookies that may be used on this website and on other websites, mobile sites and applications managed by ADV Companies fall into the four categories described below. These descriptions can help you determine if and how you would like to interact with our websites and other online services.

Strictly necessary cookies

ADV Companies use cookies essential in order to enable you to navigate this website and use certain features. Without these strictly necessary cookies, the online services you have asked for, like login maintenance, cannot be provided. Consent is not compulsory for strictly necessary cookies as they are required for us to provide the services requested by you.

Performance cookies

We (or service providers operating on our behalf) may place our performance cookies on your device. The information collected using our performance cookies is used only by us or for our benefit.

Our performance cookies collect anonymous information about how you use this website and its features. For instance, our performance cookies collect information about which pages on this website you visit most often, which advertisements you view or interact with also on other sites on which our advertisements appear, if you open or read the communications we send and if you receive any error messages. The information collected may be used to customise your online experience by showing you specific and selected content we think you will find proper and interesting. Our performance cookies also may be used to limit the number of times you see the same advertisement. Our performance cookies don't collect information that identifies you personally. We also may allow third-party advertisers to place their performance cookies on your device through their advertisements on this website. As well, these third-party performance cookies do not collect information that identifies you personally. You can delete cookies or manage performance cookies tools, as wholly instructed by the browser in use.

Functionality cookies

We (or service providers operating on our behalf) may place our functionality cookies on your device. We do not share information collected using our functionality cookies with our advertisers or other third parties.

Our functionality cookies are used to remember choices you make (such as language preference, country location, or other online settings) and provide the personalised or enhanced features that you select. Our functionality cookies can be used to provide online services to you, or to prevent online services from being offered to you if you previously indicated you did not want to receive such services.

In some cases, we may allow an advertiser or other third party to provide you with content and other online experiences on this website. In these cases, the third party may place their functionality cookies on your device and use their functionality cookies in the same way ADV Companies does, to provide you personalised or enhanced features in connection with the third-party content or experience.

By selecting customised options, personalised settings, or enhanced features, you indicate consent to our use (and the use by permitted third parties) of functionality cookies to deliver these customised or personalised experiences.

If you delete these functionality cookies, any preferences or settings you selected will not be retained for later visits.

Advertising or targeting cookies

ADV Companies Targeted Advertising cookies are placed on your device by us (or service providers operating on our behalf).

We may use these cookies on Noatel Europe sites and in connection with our content and advertisements that appear on third-party sites and online services to recognise that you've viewed or interacted with our content or advertisements and so we can show you advertisements for products that we believe will be of interest to you. Our targeted advertising cookies collect anonymous information; however, if you have a registration account with us, the information collected by us using our targeted advertising cookies may be associated with your registration account.

The organisation setting the cookie (either the third party or us) is responsible for obtaining consent. Where you see this icon ▷ of third party advertising or our advertising, you can click through to learn more about behaviourally targeted

advertising, including how to exercise your control options through your browser settings. More information can be found at www.youronlinechoices.eu.

Third-Party Targeted Advertising cookies may be placed on your device by third-party advertisers, ad networks, data exchanges, marketing analytics and other service providers.

Third party targeted advertising cookies collect information about your browsing activity across multiple websites and online services in order to provide you with relevant advertisements on our websites and online services and the sites and online services of third parties. Ad networks may share this information with the advertisers using their network. The information collected using these third party advertising cookies does not identify you personally.

Registered guests.

We may analyse online activities of registered guests across Noatel sites and online services by use of cookies and other tracking technologies. Where you have opted in to receive communications from us, we may use cookies and other tracking technologies to tailor future communications to reflect your interests.

We may also use cookies or other tracking technologies within our communications to you (for example to see if they have been read or opened or to see what content you interact with and what links you follow) so that we can better match future communications to your interests.

You may opt out at any time from receiving targeted communications from us by logging into your registration account and selecting not to receive marketing communications. To opt out of targeted advertising based on your online behaviour across this and other websites please follow the instructions provided above (for targeted advertising).

Disabling/enabling cookies via your browser

There are a number of ways for you to manage cookies and other tracking technologies. Through your browser settings, you can accept or decline cookies or set your browser to prompt you before accepting a cookie from the websites you visit. You should be aware that you may not be able to use all our interactive features if you set your browser to disable cookies entirely. If you use different computers in different locations you will need to ensure that each browser is adjusted to suit your preferences. You can delete any cookies that have been installed in the cookie folder of your browser. The various browsers provide different procedures to manage your settings.