

## COOKIES POLICY

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<b>SUMMARY:</b>	This document represents Psigma Investment Management Limited's Cookies policy
<b>OWNER:</b>	COMPLIANCE
<b>EFFECTIVE DATE:</b>	2013
<b>STATUS:</b>	LIVE
<b>REVIEW CYCLE:</b>	Annual
<b>APPROVED BY:</b>	Richard Garmon-Jones
<b>DATE OF REVIEW:</b>	January 2014

### MODIFICATION HISTORY:

VERSION	DATE APPROVED	REVIEWED BY	CHANGES
v. 2013.01	2013	Richard Garmon-Jones	New policy
v. 2014.01	24 January 2014	Tina Wishart	Annual review Format changed and additional cookie added

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## **1. OVERVIEW**

Most websites use cookies to improve the user experience by “remembering” you, to help you to navigate them efficiently and perform certain functions.

The Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011 (the Regulations) requires website owners to provide users with clear and comprehensive information about cookies or similar technologies used on their websites and requires users to provide consent to the usage of these.

The rules in this area are essentially designed to protect the privacy of internet users, even where the information being collected about them is not directly personally identifiable.

## **2. COOKIES**

### **2.1. WHAT IS A COOKIE**

A cookie is a small file, typically made up of letters and numbers, which is downloaded on to a device when the user accesses certain websites. Cookies are then sent back to originating website on each subsequent visit, enabling the website to retrieve and read the data held to “remember” the user and/or their device and provide certain functions.

The amount of data held in the cookie determines what functionality it provides and can range from simply remembering the items selected on a previous page through to remembering which items were bought from another site and providing advertising for similar products.

### **2.2. TYPES OF COOKIES**

Cookies can expire at the end of a browser session (from when a user opens the browser window to when they exit the browser) or they can be stored for longer. The Regulations apply to both session and persistent cookies.

#### **2.2.1. SESSION COOKIES**

Session cookies allow websites to link the actions of a user during a browser session. They may be used for a variety of purposes such as remembering what a user has put in their shopping basket as they browse around a site. They could also be used for security when a user is accessing internet banking or to facilitate the use of webmail. These session cookies expire after browser session so would not be stored longer term. For this reason session cookies may sometimes be considered less privacy intrusive than persistent cookies.

#### **2.2.2. PERSISTENT COOKIES**

Persistent cookies are stored on a users’ device in between browser sessions which allows the preferences or actions of the user across a site (or in some cases across different websites) to be remembered. Persistent cookies may be used for a variety of purposes including remembering users’ preferences and choices when using a site or to target advertising

### **2.3. FIRST AND THIRD PARTY COOKIES**

Whether a cookie is ‘first’ or ‘third’ party refers to the website or domain placing the cookie. First party cookies in basic terms are cookies set by a website visited by the user the website displayed in the URL window. Third party cookies are cookies that are set by a domain other than the one being visited by the user. If a user visits a website and a separate company sets a cookie through that website this would be a third party cookie.

The different cookies used can be categorised into four types:

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<sup>1</sup> <http://www.legislation.gov.uk/uksi/2011/1208/regulation/1/made>

1. **Essential** - these cookies are necessary to enable you to move about a website or to provide certain features requested.
2. **Analytic Performance Cookies** - these cookies are used to collect data on how a site is being used to enable the owners to tailor the sites structure of content. The data collected is normally anonymous and may be analysed by a third party, e.g. Google.
3. **Functional cookies** - these cookies enhance the functionality of a website by remembering your preferences, e.g. which town/ city you live in.
4. **Behavioural/ Third party** - these cookies collect data on your browsing activity and this data is then used to provide tailored advertising based on this activity over time, e.g. if you are looking at car insurance products, you may be offered similar insurance products provided by third parties within advertising banners or similar.

### 2.3.1. WHO USES THE INFORMATION GATHERED

The information gathered by cookies may be used by the website owners (First Party) or may be supplied to other parties to offer users related services e.g. behavioural marketing (Third party).

### 2.3.2. HOW LONG DO THEY LAST

Cookies can expire at the end of a browser session (when you exit/ shut down the browser) in which case they are called Session Cookies, or can be stored on the computer in between browsers sessions, in which case they are called Persistent Cookies.

## 3. COOKIES USED ON THIS WEBSITE

The cookies used on this website are:

- Session cookies
- First party cookies.

The cookies used on this website and the purpose of each is detailed below:

COOKIE NAME	PURPOSE OF COOKIE
ASPXAUTH	Stores the authorisation following login, to further authenticate the user within the site
ASP.NET_SessionId	Stores the user's session details, which maintains information throughout the site during the length of the session visit

### 3.1. WHAT CAN YOU DO IF YOU DON'T WANT TO ACCEPT THE COOKIES WE USE?

By continuing to use this website, you agree to having the cookies detailed above stored on your device. You may refuse to accept cookies by adjusting the settings on your browser that allows you to refuse the setting of cookies; however, if you select this setting you may be unable to access certain parts of our site.

If you wish to restrict or block the use of cookies from our sites or others, the Help function within your browser will guide you through the process. The website [www.aboutcookies.org](http://www.aboutcookies.org) also contains additional detailed guides on how to do this on a wide variety of browsers.

Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.