COOKIE POLICY

16TH April 2024

Introduction

Circles is the data Controller who collects and processes the personal information you provide on our different websites, portals, applications, and platforms ("Our Site").Our Cookie policy aims to show you how we respect the privacy of all visitors and users of Our Site. If you have any questions regarding the more general processing of your personal information on Our Site, please refer to our Local Online Privacy Policies**.**

Definitions

Controller

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

Cookies

As defined in Section 1 of this policy.

Our Site

The Circles website, portal, application, or platform you are using.

Personal Data

Means any information relating to an identified natural person or one that can be directly or indirectly identified by reference to an identification number or to one or more factors specific to this person.

Processor

A natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

"Us" or "Our"

The Circles entity acting as data Controller.

You

Our Site user/visitor.

1. **What are Cookies and Similar Technologies?**
   Cookies are small files, downloaded on your device when you access Our Site, with the aim to recognize your device or to store information about your preferences or past actions. They are used to help you navigate efficiently and perform certain functions on all our different Sites. Other tracking technologies, such as pixel tags or web beacons, may also be used on your device to collect unique identifiers associated with it and other data such as your IP address. Pixels tags or web beacons are small images placed on a web page or in an email.

   The web beacon operates as a tag that records a user's visit to a particular web page or viewing of a particular e-mail. Some tracking technologies are specific to mobile applications such as the SDKs (Software Development Kit). SDKs are packages of tools that help our apps function on an iOS or Android environment. SDKs help us understand how you interact with Our Site and collect certain information about the device and network you use to access, it also helps our applications communicate with third parties through what is called an application programming interface, or API (e.g. when sharing content on Facebook).

   SDKs may then collect and send data back to the third party that provides them (e.g. Google or Apple, Facebook etc.), which may be used to build your profile as the application user, which can then be used for targeted ads. These tracking technologies use data in the same way as cookies and as such are subjected to this policy. We use the term "Cookies" in this document for all the different kinds of tracking technologies, as a facilitator for the global understanding on all Our Sites.

2. **What Cookies Do We Use?**
   The types of Cookies that we use may be:
   Session Cookies: such Cookies allow Our Site to link your actions during a session and are automatically deleted when you close your session on Our Site.
   Persistent Cookies: such Cookies remain stored in your device until it reaches a defined expiration date which can be days or minutes. They may be used for a variety of purposes including remembering your preferences and choices when using a Site or for targeted advertising.
   First party Cookies: such Cookies are stored by the Site you are visiting, with the purpose to improve your experience and are set by a Site owner (us).
   Third party Cookies: such Cookies are set by a technology provider, such as an analytics company, advertising network or social media platform that is independent from us.
   More specifically, the Cookies used on Our Site are categorized as follows:
   Strictly necessary cookies;
   Functional cookies;

Audience measurement cookies;
Targeting cookies (which can also include social network Cookies)

Strictly necessary cookies

These cookies must be present for the Site to provide the basic functions and without which the Site and its functionalities would not work correctly. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms (e.g., to register to events or to provide feedbacks). They can also maintain your session open when you identify yourself on the Site. Your consent is not necessary for these Cookies according to the applicable regulation but you should be informed of their use. More information on the different Strictly necessary Cookies used on Our Site, including the data retention period, purpose and third parties if any, can be found in the cookie settings and in Sections 3 and 4 of this policy.

Functional Cookies

These cookies help us to remember the settings which you have selected or assist with other functionality when you use Our Site. This helps us remember your preferences when you return to Our Site. These Cookies enhance functionality and personalization. They may be set by us or by third party providers whose services we have added to Our Site. You can set your browser or cookie settings to block these Cookies, but be aware that, in that case, some or all of these functionalities may not function properly and that some parts of Our Site may not work. You can manage your consent and find more information on the different Functional Cookies used on Our Site, including the data retention period, purpose and third parties if any, can be found in the cookie settings and in Sections 3 and 4 of this policy.

Audience Measurement Cookies

These cookies include analytics technologies, help us with the performance and design of Our Site. This function allows us to measure how many times a page has been visited, to know which pages and functionalities are the most and least popular and see how visitors move around the Site to improve your experience. Those Cookies might also count visitors who have come to Our Site after having viewed a Circles banner ad on a third-party site. If you do not accept these Cookies, or withdraw your consent, we will have no supporting information to improve Our Site or to determine how well it is received by our end users. These Cookies basically allow you to let us know how well Our Site is doing. The information collected by these Cookies could also be aggregated. Our Site analytics metrics, reports and statistics, if used alone, do not allow us or our providers, to identify an individual User. In this case, the Cookie may not be subject to your consent. You can manage your consent and find more information on the different Audience measurement Cookies used on Our Site, including the data retention period, purpose and third parties if any, in the cookie settings and in Sections 3

and 4 of this policy.

Targeting Cookies
Targeting, and or "advertising" Cookies are installed on Our Site by us and our advertising partners to present advertisements that are relevant to you and better reflect your interests instead of generic advertisements that might not interest you. These cookies can include social network Cookies that allow you to share content on social networks and to improve the user-friendliness of our content thanks to the sharing buttons, in particular towards Facebook, Twitter and LinkedIn. The social networks that provide the sharing buttons may identify you through this process only if your account on the relevant network was activated on your terminal. Circles does not have control over the process used by social networks to collect information about you. Targeting Cookies uniquely identify your browser and/or your device. If you do not allow these Cookies, you will not experience our targeted advertising across different platforms. It is possible however that you may still see our non-targeted advertisements on these platforms. These Cookies collect information relating to the origin of your visit, where you were exposed to Circles advertising, what advertising feature you saw, whether you arrived directly or indirectly to Our Site, the device you used to visit Our Site and which downloads you performed. In addition, we also use Cookies on certain parts of Our Site to communicate with third party data providers to extrapolate your digital behaviour. This helps us understand your behaviour and provide more relevant advertising in the future. You can manage your consent and find more information on the different Targeting Cookies used on Our Site, including the data retention period, purpose and third parties if any, in the cookie settings and in Sections 3 and 4 of this policy.

3. How Long Are Cookies Stored?
Session Cookies are automatically deleted when you close your session. Persistent Cookies will be stored on your device for a maximum duration of 13 months unless you clear the Cookies using your browser settings and erase your browser cache.

4. How to Manage Cookies on Our Site?
When you first visit Our Site, a banner aimed at obtaining your consent to the use of Cookies will appear. As long as you have not expressed your choice, this banner will remain visible, in accordance with the applicable regulation and no Cookies (other than Strictly Necessary Cookies) will be installed on your device. When you choose to refuse Cookies, an opt-out Cookie will be placed on your device, so that we can record the information that you have objected to the use of Cookies. Every six (6) months, we will ask you to confirm your choice to the installation of Cookies with the reappearance of the Cookie banner. If you delete the opt-out Cookie (by erasing your browser cache or using the privacy mode for example), it will no longer be possible to identify you as having opted out to the use of Cookies. Consequently, you will be offered the choice concerning Cookies again the next time you visit Our Site. Strictly necessary Cookies do not require your consent.

COOKIE POLICY

For Functional, Audience measurement and Targeting Cookies, you can give your consent or refuse them at any time by:

1. Using the Cookie settings available on the banner or at any time on Our Site; The Cookie settings provide all the information about the purpose of each Cookie that could be installed on your device in the "Cookie Details". You can then make an informed choice for each of the categories of Cookies.

2. Setting up your device or browser settings to accept or refuse Cookies.

However, please be aware that if you do turn off Cookies you will not be able to fully experience some of the features of Our Site. For example, you will not be able to benefit from automatic log-on and other personalization features of Our Site. Please also note that you would need to set up all the browsers of your different devices (tablets, smartphones, computers) in order to always refuse Cookies. There are various ways to configure browsers. Please refer to the "Help" section of your browser to understand how to configure it and exercise your options.

You also have the possibility to disable the following audience measurement cookies:

1. You can disable "Google Analytics" Cookies, by downloading the module accessible from the following address: https://tools.google.com/dlpage/gaoptout/

2. You can disable the Insight Tag of LinkedIn, by modifying your user settings on LinkedIn: https://www.linkedin.com/psettings/

Regarding social network Cookies, please consult the relevant policies of the social network to learn more about the purposes for which they use the information collected via the sharing buttons and to know how to exercise your choice.

5. Changes to this Cookie Policy
We may change this Cookie policy statement as needed. Please note that this policy is likely to change with the future entry into force of any new applicable regulation or law, and in particular in the European Union, the e-Privacy Regulation. If changes to the policy are made, it may take up to 30 business days before new privacy practices are implemented. Check this page periodically if you would like to monitor changes. Changes in this policy may also trigger the Cookie banner to reappear.

COOKIE POLICY

6. Contact Us

If you have any questions or you do not feel that your concerns have been addressed in this Cookie policy, please contact us by sending an email to the local data protection team at
Privacy.Circles.UK@sodexo.com