# **Equifax Cookies Information and Privacy Notice**

Welcome to the Equifax Cookies Information and Privacy Notice ("**Notice**"), which sets out details of the cookies that Equifax Limited ("Equifax" or "we", "our" and "us"), together with our service provider Sub2 Technologies Limited ("Sub2"), facilitates as part of our services to our clients.

The most likely reason that you are reading this page is because you have clicked a link on the website of one of our clients and you are seeking information on what cookies Equifax assists our client deploy on its website and how we use the information obtained from use of that cookie.

#### WHAT ARE COOKIES AND WHAT IS EQUIFAX'S ROLE?

Cookies are files or text information that may be stored on your computer (or other internet enabled device, such as a smart phone or tablet) when you visit a website.

A cookie will usually contain the name of the website on which the cookie is deployed, the "lifetime" of the cookie (i.e. how long it will remain on your device) and a value, which is usually a randomly generated unique number.

Many of our clients will use cookies for a variety of purposes, including to ensure the functionality of their website or to track your use of it and other websites. The information generated by some cookies can therefore be used to serve you with advertising which is more aligned to your browsing habits and apparent interests.

The website from which you received a link to this page (the "**Website**") likely uses certain cookies that we have enabled our client to use on the Website (the "**Equifax Cookies**"). Equifax does not directly place these cookies on your device; this is done by our client via their Website.

Where use of the Equifax Cookies involves the processing of personal data (please see below), Equifax is the Controller of that personal data together and jointly with its service provider Sub2.

This notice explains what the Equifax Cookies are, what data they collect, your options in relation to them and how any personal data is processed by us and Sub2.

Please note that our client (the relevant owner of the Website) will likely also act as a Controller of personal data collected via the Equifax Cookies. However, their processing of such personal data is not covered in this Notice. Please make sure you read the relevant privacy notice of the Website owner/operator for more information.

If you would like more information about cookies generally, please visit: <a href="https://www.allaboutcookies.org">www.allaboutcookies.org</a>

#### **EQUIFAX COOKIES**

The Equifax Cookies include the following categories of cookies:

- First party cookies set by the Website owner these are used in order for Equifax to provide advertising services to our client (the Website owner). In order to decide which products and services may be of interest to you the following data points are collected against this cookie (for the avoidance of doubt, no personal information including name, address, contact details or application data is ever collected as part of this service):
  - Each page visited on the Website
  - Any loan sum or term requested
  - Whether our client approves or declines the application made on the Website.
- Third party advertising cookies set by Equifax's third party advertising
  network partners cookies set by third parties enable third party advertising
  networks to know when to place their own advertising cookies via our clients'
  websites. These third party advertising networks obtain the relevant cookie
  data to be able to serve targeted advertising to you. The cookies that are used
  are not Equifax cookies and Equifax does not access the cookie information
  from the viewer's device directly.

## WHAT INFORMATION DO WE PROCESS?

Through the Equifax Cookies, we will capture certain information, which we then analyse to assist our clients (the Website owner) with their online marketing.

In relation to each type of Cookie, Equifax and Sub2 do not use any of the data to identify you as an individual. However, we do identify the browser you are using and link information to this, which may be considered personal data.

Equifax and Sub2 are Joint Controllers of any such personal data and our clients are independent Controllers of the same.

While not all the information we process will be personal data, we have provided details below regarding the types of information we process, the purpose of this processing and (where the information is personal data) on what lawful basis

Our use of the Equifax Cookies includes processing the following information:

- During the session each URL of the Website browsed
- The time and date the URL was browsed
- If making an application, the amount requested to borrow and the term

Duration of session and number of sessions

#### WHAT DO WE DO WITH THIS INFORMATION AND WHY?

Our processing of any personal data for which we are Controller, is for the purposes of assisting our clients with their online marketing activities, as detailed below.

We are required by law to always have a so-called 'lawful basis' (meaning a reason or justification) for processing your personal data. There are a number of lawful basis set out in data protection law but our use of personal data is generally on the basis of your consent, which was obtained by our client (the Website owner).

Please be aware that you have the right to withdraw your consent at any point. You can do this by using the links below, which disable the relevant cookies to prevent any further collection of information (although this will not impact the processing of personal data already collected) or by contacting us at the details below, if you wish us to cease processing information already collected. We would also recommend that you disable cookies within your browser settings.

The following details our use of your personal data on the basis of your consent:

- Data from the Equifax Cookies is used by us to enable our clients to serve you with advertising that is relevant to you, based on your previous browsing habits.
- The data is also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign.

We may also need to process your information in relation to the following, which will be on the basis of our legitimate interests:

- Anonymising personal data so that such anonymous data can be used for analytical purposes, including to help us improve our services;
- Using any relevant personal data for our general record keeping and Website user management;
- Using any relevant personal data to establish and enforce our legal rights or to comply with a court order, law enforcement requirement (or other legally mandated request) or legal obligation (please note that such processing may also be necessary to comply with a legal obligation to which we are subject); and
- Using any relevant personal data in relation to the managing the proposed or actual sale, restructuring or merging of any or all part(s) of our business.

Where you contact us in relation to our use of the Equifax Cookies or your personal data, we will also process any personal data you provide as part of such communications, to respond to you.

We may also be separately processing personal data about you in relation to other products and services Equifax provide. Such processing will be covered by separate fair processing notices, which will have been made available to you. For example the 'Equifax Information Notice' – a copy of which can be found here.

#### WHO WE SHARE YOUR INFROMATION WITH

Equifax and Sub2 will share your information with our clients (the Website owners) so that they can improve their online advertising to you, through your browser.

Where this information includes personal data, our clients will process that personal data as an independent controller, which is not covered by this Notice (as explained above).

We may also share your information with the below categories of recipient:

**Service Providers**: Equifax and Sub2 may share your personal data with entities that provide services to it, such as vendors and suppliers that provide Equifax with technology, services, and/or content for the operation and maintenance of the Equifax Cookies and the Digital Hub from which our clients access the information. Access to your personal data by these service providers is limited to the information reasonably necessary for the Service Provider to perform its limited function. Equifax and Sub2 take steps to help ensure that Service Providers keep your personal data confidential and secure.

**Disclosure for Legal Reasons or as Necessary to Protect Equifax/Sub2**: Equifax and Sub2 may release personal data to other parties: (1) to comply with valid legal requirements such as laws, regulations, search warrants or court orders; or (2) cases in which Equifax/Sub2 believes it is reasonably necessary to investigate or prevent suspected or actual harm, abuse, fraud, or illegal conduct.

Changes in the corporate structure of Equifax/Sub2: If all or any part of Equifax or Sub2 is sold, merged or otherwise transferred to another entity (including a transfer of assets), the personal data about you may be transferred as part of that transaction.

### WHERE YOUR INFORMATION WILL BE PROCESSED

Both Equifax and Sub2 are UK based companies and the majority of our processing will take place within the UK. However, some of our Service Providers (please see above) may have processing operations in other jurisdictions.

Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under UK laws.

### **HOW LONG WILL WE RETAIN YOUR PEROSNAL DATA?**

We will only retain your personal data for a limited period of time and for no longer than is necessary for the purposes for which we are processing it.

In some cases, it may be necessary for us to retain your personal data for longer. The factors that direct how long we will retain personal data include the following:

a) any laws or regulations that we are required to follow;

- b) whether we are in a legal or other type of dispute with each other or any third party
- c) the type of information held about you; and
- d) whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.

# **EQUIFAX COOKIES:**

# FIRST PARTY COOKIES SET BY THE WEBSITE OWNER

# (V1V4, S2SV4 and S2Cons)

Cookie Provider	Name of Cookie	Type of Cookie	Description
Equifax (set by Website owner)	v1v4	Persistent – this cookie has a lifespan of 12 months.	This is the main Equifax cookie that allows all Equifax services (as described above) to operate. It allows the Equifax service to function for the Website and registers the URL(s) of the Website that you are visiting.
Equifax (set by Website owner)	s2sv4	Session – These allow browsers to be recognized within a website visit. These cookies expire when the browser is closed.	This is a session cookie that stores information such as the number of pages into this session and a customer or non-customer flag
Equifax (set by Website owner)	S2Cons	Persistent – this cookie has a lifespan of 12 months	This cookie stores users consent (consent given for purposes and vendors used by the Website )

### Further details:

- These cookies are first party cookies which are relevant only to your device when browsing a Website that has enabled Equifax applications.
- These cookies do not track your browsing on other websites. Unlike some types of cookie (such as many targeted advertising cookies), these cookies

are not used to see what other websites you visit. They only track your use of the Equifax-enabled Website operated by our client.

To disable the above Cookies click here.

# THIRD PARTY ADVERTISING COOKIES SET BY EQUIFAX AND SUB2'S THIRD PARTY ADVERTISING NETWORK PARTNERS

Cookie Provider	Name of Cookie	Description
Bluekai	Bkc, bkdc, bklc, bkst, bku	For more information about the type of cookies Bluekai use, please visit https://www.oracle.com/legal/privacy/marketing- cloud-data-cloud-privacy-policy.html and visit http://www.bluekai.com/consumers.php#optout to opt-out
Google Doublecli ck	ncuid, IDE, DSID, Cto_lwi d, _ct_rm m	For more information about the type of cookies Google use please see  https://www.google.com/intl/en/policies/technologie s/types/  Please visit the Network Advertising Initiative opt-out page to opt-out http://optout.networkadvertising.org/?c=1
AppNexu s	uuid2, uids, sess, icu, anj, usersyn c, token	For more information about the type of cookies AppNexus use, please visit:  https://www.appnexus.com/en/company/platform- privacy-policy

# YOUR OPTIONS IN RELATION TO THE EQUIFAX COOKIES

If you do not agree with the use of Equifax Cookies, you can follow the links above to opt-out or set your browser settings accordingly. Please be aware that if you disable cookies, this may impact your experience and use of the Website.

Most internet browsers are automatically set up to accept cookies. You can change the settings to block cookies or to alert you when cookies are being sent to your device. There are a number of ways to manage cookies. Please refer to your browser instructions or help screen for further guidance.

Please be aware that if you use different devices (or different web-browsers on the same device) to view and access the Website, you will need to ensure that each browser on each device is adjusted to suit your cookie preferences.

#### YOUR RIGHTS IN RELATION TO PERSONAL DATA

Data protection law provides you with a number of rights in relation to your personal data (which are summarized below). You can exercise these rights by contacting – please see 'CONTACT US' below.

Subject to the requirements of applicable laws and certain limitations or exemptions, you have the right to:

- a) access your personal data and be provided with certain information in relation to it, such as the purpose for which it is processed;
- b) require us to correct any inaccuracies in your personal data without undue delay;
- c) require us to erase your personal data (please be aware that the right of erasure under data protection law is not an absolute right as it only applies in relation to one or more specific circumstances);
- d) require us to restrict the processing of your personal data;
- e) receive the personal data which you have provided to us in a machine readable format, where we are processing it on the basis of consent and such processing is automated; and
- object to a decision that we make which is based solely on automated processing of your personal data.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), which is the UK data protection regulator. More information can be found on the ICO website at https://ico.org.uk/

#### CHANGES TO THIS NOTICE

Equifax may change this Notice from time to time. If we make changes to this Notice, we will make the date of amendment clear at the bottom.

### **CONTACT US**

If you would like more information about the Equifax Cookies and how we use them, then please contact us at <a href="mailto:ContactUKDPO@equifax.com">ContactUKDPO@equifax.com</a>

Date last updated: 10 June 2019