

COOKIE AND TRACKING POLICY

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1 WHAT ARE COOKIES AND TRACKING TECHNOLOGIES?

Cookies are small files containing bits of data which are stored on your device (computer or mobile) when you visit our website. Cookies are the tool, which makes it possible for the website to remember your actions and preferences for a certain period of time. A cookie can e.g. store information you have provided previously (so you do not need to provide same information when you come back to the site or browse from one page to another) or store your user preferences such as language, font size and display options.

You can find out more information on cookies in general on the internet e.g. by entering “*what are cookies*”, “*cookies explained*” or “*how does online tracking work*” in any of the popular search engines.

2 FOR WHAT PURPOSES DO WE USE COOKIES?

We use cookies to generate usage statistics on our site visitors to improve your visiting experience and to develop our business. These can be divided into two main categories:

- Cookies incorporated into WordPress publishing platform are used to enhance the user experience of our websites, such as remembering users' actions or preferences.
- Cookies by Google Analytics are used to identify the user, for online behavioral advertising and website visitor analytics.

Some of these cookies retain user information beyond a single session. Information stored by the cookies are managed by Sparta Consulting and third parties involved in our website hosting & analytics and online advertising.

3 HOW TO CONTROL COOKIES AND OTHER TRACKING TECHNOLOGIES

All the common web browsers have the possibility to adjust the level of cookies and tracking technologies the site the user is visiting can use. At the same time, you control the level the sites can or cannot process your personal information. You can also delete cookies that already are stored on your device.

You can find more detailed instructions on how to control cookie and tracking settings by searching the relevant browser setting instructions on the internet. More details can also be found at aboutcookies.org

Part of the cookies and tracking technologies we use are essential to the functionality of our websites. You can change your cookie and tracking technology settings in your browser to block the use of those technologies. Be advised that by blocking these strictly necessary cookies, we cannot guarantee the correct behavior and full functionality of our sites.

4 RETENTION OF COOKIES AND TRACKING DATA

The period a cookie or similar tracking technology stores the information it has gathered vary considerably. Most of the technologies store the information for the duration of your site visiting session after which the data is deleted, while some might store the data for a period of several months and up to 10 years. A few of the technologies preserve some form of identification data until cookies are deleted (persistent). There is a table further down that provide more information on the retention times.

5 3RD PARTY COOKIES AND TRACKING TECHNOLOGIES USED

Our websites use cookies and tracking technologies provided by external parties. By visiting our websites, you provide these parties your personal data, e.g. the IP-address of your device or other identification information.

Statistic and Technical cookies help us to understand how visitors interact with websites by collecting and reporting information in many cases, anonymously.

Marketing cookies include cookies and tracking that in many cases can identify the visitor across website pages and even different websites. Additionally, the intention of using this is to provide visitors with most relevant content and ads, in some cases, based on visitor's session behavior or earlier interaction with the site.

In the table below, you will find more detailed information on the listed 3rd party services and their processing of personal and possibly other identifiable data.

Many of these 3rd party services offer functionality and instructions on how to opt-out, i.e. the service will no longer process the personal information and/or anonymous information that you and your behavior on the website(s) provide.

6 3RD PARTY DATA PROCESSING DETAILS

Name	Purpose	Data scope	Identification of the user	Data retention	Settings/ information
Google Analytics	Site/shop visit/usage information	Used to throttle request rate. Sends data to Google Analytics about the visitor's device and behavior	Unique ID tracks the visitor across	Google Analytics	Site/shop visit/usage information

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Google Tag Manager	1: development of site user experiences 2: Site visit/ usage information 3: Targeted marketing activities	A tool to add and update website tags for example usage information, site analytics, remarketing	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	Session or up to 2 years	Google Tag Manager
Google Ad Words	Targeted marketing activities	Google AdWords re-engages visitors that are likely to convert to customers based on the	Google Ad Words	Targeted marketing activities	Google AdWords re-engages visitors that are likely to convert to customers based on the

7 DATA DISCLOSURE OUTSIDE EU / EUROPEAN ECONOMIC AREA

Some of the cookies and tracking technologies used by our websites may send personal data outside of the EU / European Economic Area. In those cases, the parties providing the services to our websites, have committed to use the necessary safeguards, which ensure that your data continues to be protected according to EU's General Data Protection Regulation (GDPR).

8 YOUR RIGHTS AND MORE INFORMATION ON PROCESSING OF PERSONAL DATA

Cookies and other tracking technologies we and our service providers are using, can constitute a processing of personal information as defined in the GDPR. As a data subject (per GDPR) you have the rights to lawful and secure processing of your data.

How you can exercise these rights is explained in our Privacy Notice found on the web page. The privacy notice also contains more information on our processing of personal data.

9 VERSION HISTORY AND CHANGES TO THIS PRIVACY NOTICE

Sparta will update this privacy notice whenever necessary due to e.g. changes in our processes or recipients, or in the applicable legislation. We will publish the changes on our website and document them in the version history below. Significant changes may be communicated directly to those persons whose personal data is affected (and whose contact data is available).

Version history:

Version	Change	Date
1.00	First publication on the web site	31.10.2018