

ALETHENA COOKIE POLICY

Effective Date: May 25, 2018

This Cookie Policy explains how Alethena and its sub-websites ("Alethena", "we", "us" and "our") use cookies and similar technologies when you visit our websites located at alethena.com, when you use the Alethena mobile app, and/or interact with Alethena online advertisements or marketing emails (collectively the "Services"). It explains what these technologies are and why we use them, as well as your rights to control our use of them.

In some cases, we may use cookies and similar technologies to collect personal information, or information that becomes personal information if we combine it with other information. In such cases the [Alethena Privacy Policy](#) will apply in addition to this Cookie Policy.

If you have any questions about our use of cookies or other technologies, please email us at privacy@alethena.com.

WHAT ARE COOKIES?

Cookies are small files, typically of letters and numbers, downloaded onto your computer or mobile device when you visit certain websites. When you return to these websites, or visit other websites that use the same cookies, the websites recognize these cookies and your browsing device. A cookie cannot read data off your hard drive or read cookie files created by other websites.

Cookies set by the website operator are called "first party cookies". Cookies set by parties other than the website operator are called "third party cookies". The parties that set third party cookies can recognize your computer both when it visits the Alethena website and when it visits certain other websites and/or mobile apps.

We treat information collected by cookies and other technologies as non-personal information. However, to the extent that IP addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. If we combine non-personal information with personal information, the combined information will be treated as personal information for as long as it remains combined.

More information on cookies and their use can be found at www.aboutcookies.org or www.allaboutcookies.org.

WHY DO WE USE COOKIES?

When you access our Services, we or companies we work with may place cookies on your computer or other device. These technologies help us better understand user behavior, and inform us about which parts of our websites people have visited.

We use first party and third party cookies to recognize you as an Alethena customer, customize Alethena Services, content, and advertising, to measure promotional

effectiveness, and to collect information about your computer or other access device to mitigate risk, help prevent fraud, and promote trust and safety.

We may place cookies from third-party service providers who may use information about your visits to other websites to target advertisements for products and services available from Alethena. We do not control the types of information collected and stored by these third-party cookies. You should check the third-party's website for more information on how they use cookies.

The following are some examples of non-personal information that we collect and how we may use it:

- We may collect and store details of how you use our Services. Except in limited instances to ensure quality of our Services over the Internet, such information will not be associated with your IP address.
- We may collect information such as your language, zip code, area code, unique device identifier, referrer URL, location, and the time zone so that we can better understand customer behavior and improve our Services.
- We may collect information regarding customer activities on our website, which is used to understand which parts of our Sites and Services are of most interest. This data is aggregated, and thus is considered non-personal information for the purposes of this Privacy Policy.

WHAT TYPES OF COOKIES DO WE USE?

We use the following types of cookies:

- **Strictly Necessary Cookies**

These cookies are essential because they enable you to move around our Services and use certain features on our Services. For example, strictly necessary cookies allow you to access secure areas. Without these cookies, some Services cannot be provided.

- **Performance/Analytics Cookies**

These cookies collect information about how you use a website. For example, a performance/analytics cookie will collect information about which pages you go to most often, how much time you spend on that page, or if you get error messages from certain pages. These cookies do not gather information that identifies you. The information these cookies collect is anonymous and is only used to improve how our Services work.

- **Functionality Cookies**

These cookies allow us to remember the choices you make and to tailor our Services so we can provide relevant content to you. For example, a functionality cookie can remember your preferences (e.g., country or language selection), or your username.

- **Session Cookies**

We use session cookies when you access our website or content. Session cookies expire and no longer have any effect when you log out of your account or close your browser.

HOW LONG WILL COOKIES STAY ON MY BROWSING DEVICE?

The length of time a cookie will stay on your browsing device depends on whether it is a "persistent" or "session" cookie. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your browsing device until they expire or are deleted (i.e. after you have finished browsing).

WHAT OTHER SIMILAR TECHNOLOGIES DOES ALETHENA USE?

In addition to cookies, we may use other similar technologies, like web beacons to track users of our Services. Web beacons, or "clear gifs," are tiny graphics with a unique identifier, similar in function to cookies. They are used to track the online movements of web users.

In contrast to cookies, which are stored on a user's computer hard drive or device, clear gifs are embedded invisibly on web pages and are about the size of the period at the end of this sentence. We and our third-party service provider employ web beacons for the reasons stated above (under "Cookies"), but primarily to help us better manage content on our Services by informing us which content is effective.

We may also use so-called "Flash Cookies" (also known as "Local Shared Objects or "LSOs") to collect and store information about your use of our services, fraud prevention and for other site operations.

DOES ALETHENA USE ADVERTISING COOKIES?

Alethena may use third party service providers to display advertising on our Services and serve advertising on other third party sites that are more relevant to you or your interests. They are also used to limit the number of times you see an advertisement, as well as help measure the effectiveness of the advertising campaign. They remember that you have visited a website and this information may be shared with other organizations, such as advertisers. This means that after you have been to our websites, you may see some advertisements about our Services elsewhere on the Internet. The information collected through this process by the third party service providers does not enable us or them to identify your name, contact details or other personal information that directly identifies you unless you choose to provide these. Such advertising will only be delivered where permitted by applicable law.

HOW TO MANAGE COOKIES, SIMILAR TECHNOLOGIES AND TARGETED ONLINE MOBILE ADVERTISING

You have the right to decide whether to accept cookies. You can exercise your preferences in relation to cookies served on our Sites by taking the steps outlined below.

Our Cookies (or, "First-Party Cookies"). You can use the browser with which you are viewing this website to enable, disable or delete cookies. To do this, follow the

instructions provided by your browser (usually located within the "Help", "Tools" or "Edit" settings). Please note, if you set your browser to disable cookies, you may not be able to access secure areas of the Site. Also, if you disable cookies other parts of the Services may not work properly. You can find more information about how to change your browser cookie settings at <http://www.allaboutcookies.org>.

Mobile Advertising: You can opt out of having your mobile advertising identifiers used for certain types of advertising by accessing the settings in mobile device and following the instructions. If you opt-out, we will remove all data about you and will not collect any further data. The random ID previously assigned to you will be removed. Thus, if at a later stage, you decide to opt-in, we will be unable to continue and track you using the prior ID and you will for all practical purposes be a new user.

Third-Party Cookies. To opt-out of third-party advertising networks and similar entities that use targeting/advertising cookies, go to <http://www.aboutads.info/choices>. Once you click the link, you may choose to opt-out of such advertising from all participating advertising companies or only advertising provided by specific advertising entities. For more information about third-party advertising networks and similar entities that use these technologies, please see <http://www.aboutads.info/consumers>.

Do Not Track: Some Internet browsers - like Internet Explorer, Firefox, and Safari - include the ability to transmit "Do Not Track" or "DNT" signals. Since uniform standards for "DNT" signals have not been adopted, our Sites do not currently process or respond to "DNT" signals.

Flash Cookies. If you do not want Flash Cookies stored on your computer, you can adjust the settings of your Flash player to block Flash Cookies storage using the tools contained in the website storage settings panel. You can also control Flash Cookies by going to the global storage settings panel and following the instructions. Setting the Flash Player to restrict or limit acceptance of Flash Cookies may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with our services or online content.

WILL THIS COOKIE POLICY BE UPDATED?

We may update this Cookie Notice from time to time to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. If we do, you will be notified when you first visit our website after the change. You can also revisit this page if you wish to keep yourself informed.