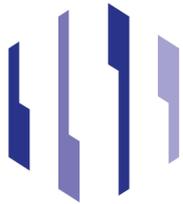




poundtoken.io



**blackfridge**

Cookie Policy

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## 1. INTRODUCTION

Please read this cookie policy carefully as it contains important information on who we are and how we use cookies on our website. This policy should be read together with our Privacy Policy which sets out how and why we collect, store, use and share personal information generally, as well as your rights in relation to your personal information and details of how to contact us and supervisory authorities if you have a complaint. Terms defined in our Privacy Policy shall have the same meaning in this Cookie Policy.

**poundtoken.io** and **poundtoken** are trading names of Blackfridge SC Limited, a company incorporated in the Isle of Man. We are a pioneering fintech company that provides a fully collateralised GBP stablecoin for institutional clients, <https://www.poundtoken.io/>. In this Policy, "the business", "we", "us" and "our" refers to Blackfridge SC Limited.

The terms "you" and "your" includes our customers/clients, business partners and users of our website(s).

## 2. OUR WEBSITE

This cookie policy relates to your use of our website, including but not limited, to browse, view, register, transact and communicate with us and other users of our website.

Throughout our website we may link to other websites owned and operated by certain trusted third parties to make additional products and services available to you and to make other information available to you. These other third-party websites may also use cookies or similar technologies in accordance with their own separate policies. For privacy information relating to these other third-party websites, please consult their policies as appropriate.

## 3. WHAT ARE COOKIES?

A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

For example, we may monitor your search and browser history, IP addresses, cross-website tracking information, user behaviour on a website, browsing patterns, approximate geographical location, device data, history and preferences. This information helps us to remember your preferences on sites you visit often, to remember your user ID and historical transactions, and to help you navigate between pages more efficiently. They also help us to ensure that any preferences you see on our site are more relevant to you and your interests.

## 4. WHAT COOKIES DO WE USE?

For further information on our use of cookies, including a detailed list of your information which we and others may collect through cookies, please see [ANNEX A](#).

We use both cookies set by ourselves via our web developers (first-party cookies) and those set by others (third-party cookies). This information may also be used to help us to improve, administer and diagnose problems with our server and website. The information also helps us monitor traffic on our website so that we can manage our website's capacity and efficiency.

## 5. THE PURPOSE OF THE COOKIES AND SERVICES WE USE?

Cookies are also sometimes classified by reference to their purpose. Please refer to [ANNEX B](#) for further information.

## 6. WHAT DATA IS COLLECTED

We, as well as third parties (as part of providing their service to us) may use cookies and the technologies described in this Cookie Policy to collect and store information about your visit to our website, such as:

- The date and time you access our website.
- The internet address linking to our website.
- Pages visited
- Time spent on each page of our website.
- Links clicked and conversion information.
- Browser type.
- Mobile network information.
- Type of operating system used.
- The IP and logical address of the server you are using (but the last digits are anonymised so we cannot identify you).
- The top-level domain name from which you access the internet (e.g. .com)
- Remember you and your actions while navigating between pages.
- Remember if you have agreed (or not) to our use of cookies on our website.
- Ensure the security of the website.
- Monitor and improve the performance of servers hosting the site.
- Distinguish users and sessions.
- Improve the speed of the site when you access the content repeatedly.
- Determine new sessions and visits.
- Show the traffic source or campaign that explains how you may have reached our website.
- Allow us to store any customisation preferences where our website allows this.

#### 7. WHAT IF YOU DO NOT AGREE TO US MONITORING YOUR USE OF OUR WEBSITE (EVEN IF WE DO NOT COLLECT YOUR PERSONAL DATA)?

You can withdraw any consent to the use of cookies or manage any other cookie preferences by clicking on the 'Manage Consent' icon at the bottom left of any page on our site. You have the ability to change your preferences by clicking on 'cookie settings' and moving the appropriate sliders to either enabled or disabled, and the click 'save & accept'. It may be necessary to refresh the page for the updated settings to take effect.

Third-party cookies are often blocked and deleted through browser settings and security settings; by default, Mozilla Firefox blocks all third-party cookies; Chrome and Apple Safari have recently begun doing so as well. Blocking third-party cookies does not create login issues on websites (which can be an issue after blocking first-party cookies) and may result in seeing fewer ads on the internet. However, blocking all cookies can sometimes lead to problems, as some websites rely on first-party cookies to function properly. If you do not want to accept any cookies, you may be able to change your browser settings so that cookies (including those which are essential to the services requested) are not accepted. If you do this, please be aware that you may lose some of the functionality of our website.

For further information about cookies and how to disable them please go to the [guidance on cookies](#) published by the UK Information Commissioner's Office, [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

To opt out of being tracked by Google Analytics across all websites, Google have developed the Google Analytics opt-out browser add-on. If you would like to opt out of Google Analytics, you have the option of downloading and installing this browser add-on which can be found under the link: <http://tools.google.com/dlpage/gaoptout>.

#### 8. REVISIONS TO THIS COOKIE POLICY

From time to time, we may make changes to our privacy practices, including our Privacy Policy and this Cookie Policy. Where we do so, we will notify those who have a business relationship with us or who are subscribed to our emailing lists directly of the changes and change the 'Last Updated' dates on such policies. Any amended policy will be effective immediately after the date it is posted, and you will be prompted to accept the amended policy.

If you do not accept changes which are made to this Cookie Policy, or take any measures described above to opt-out by removing or rejecting cookies, you may continue to use this website but accept that it may not display and/or function as intended by us. Any social media channels connected to us, and third-party applications will be subject to the privacy and cookie policies and practices of the relevant platform providers which, unless otherwise indicated, are not affiliated, or associated with us. Your exercise of any rights to opt-out may also impact how our information and content is displayed and/or accessible to you on this website and on other websites.

#### 9. HOW TO CONTACT US

If you wish to contact us, please send an email to [hello@poundtoken.io](mailto:hello@poundtoken.io) or write to us at our registered address Blackfridge SC Limited, 55 Athol Street, Douglas, Isle of Man.

#### 10. DO YOU NEED EXTRA HELP?

If you would like this notice in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).

#### 11. LATEST UPDATE

15<sup>th</sup> March 2022 – Reviewed by CTO and Board

ANNEX A

The cookies we use	Purpose	Whether cookie is essential for us to provide you with a service that you have requested and whether we will seek your consent before we place the cookie
Session cookies	Essential Cookies that enable you to use the features of the site. The session cookie stores data that you have inputted in a temporary memory location and then the data is deleted when the session is complete, or you close your browser.	Without these cookies you will be unable to use basic functions of the site such as, registration. These session cookies do not gather information that could be used for marketing or track your internet browsing.
Persistent Cookies	A data file that can provide the site with information such as user preferences and information for future visits to improve the user experience. The persistent cookie will have a set expiry date.	The most popular persistent cookie is the Google Analytics cookie which tracks what people like as they move around the website to help improve the user experience.
HttpOnly Cookie	A type of session cookie used to prevent a Cross-Site Scripting exploit from gaining access to the session cookie and hijacking the victim's session. The HttpOnly flag is a useful prevention mechanism, as it instructs the user-agent to restrict access to the cookie only for use with HTTP messages. Cross site scripting occurs when a user injects malicious script into an otherwise trusted website. The malicious script will then run on the victim's web browser, often to steal user information such as credentials, session cookies and other sensitive data.	HTTP cookies are built specifically for Internet web browsers to track, personalise and save information about each user's session. HttpOnly cookies provide an extra layer of protection for you and our site.
Third-party Cookie	A third-party cookie is placed on a website by someone other than the owner (a third party) and collects user data for the third party.	Third parties use these cookies to track users between websites and display more relevant advertising. We may work with advertisers, and advertising service providers to serve ads that may be relevant to you based on your inferred interests, location or other information collected about you, which may use cookies or the technologies described below, placed by us or the third party (although we would not share any other information that identifies you with an advertiser) on our website, or on a third-party website or online service. The placing of these technologies on your device may enable you to be identified across multiple websites and online services.

## ANNEX B

Analytical/performance cookies	They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it, as well as dates and times they visit. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
Targeting cookies	These cookies record your visit to our website, the pages you have visited and the links you have followed, as well as time spent on our website, and the websites visited just before and just after our website. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
Other technologies	In general, we use cookies and other technologies (such as web server logs) on our website to enhance your experience and to collect information about how our website is used. This information is put together ('aggregated') and provides general and not individually specific information. None of this information is therefore associated with you as an individual and the cookie-related information is not used to identify you personally. It is therefore anonymised and de-identified'. The patter data is fully under our control and these cookies are not used for any purpose other than those described here.
Pixels tags	Pixel tags (which are also called clear GIFs, web beacons, or pixels) are small pieces of code that can be embedded on websites and emails. Pixels tags may be used to learn how you interact with our website pages and emails, and this information helps us, and our partners provide you with a more tailored experience.
Device Identifiers	A device identifier is a unique label can be used to identify a mobile device. Device identifiers may be used to track, analyse, and improve the performance of the website and ads delivered.
Third-party services	We may allow others to provide analytics services and serve advertisements on our behalf. In addition to the uses of cookies described above, these entities may use other methods, such as the technologies described below, to collect information about your use of our website and other websites and online services.
Google Analytics	<p>This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). We use Google Analytics to track your preferences and also to identify popular sections of our website. Use of Google Analytics in this way, enables us to adapt the content of our website more specifically to your needs and thereby improve what we can offer to you.</p> <p>Google will use this information for the purpose of evaluating your use of our website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.</p> <p>In particular Google Analytics tells us your IP address (last 3 digits are masked), the number of pages visited, the time and duration of the visit, your location, the website you came from (if any), the type of hardware you</p>

use (i.e., whether you are browsing from a desktop or a mobile device), the software used (type of browser); your general interaction with our website, and your search history (if you decide to use the search bar at the top of our page).

As stated above, cookie-related information is not used to identify you personally, and what is compiled is only aggregate data that tells us, for example, what countries we are most popular in, but not that you live in a particular country or your precise location when you visited our website (this is because we have only half the information- we know the country the person is browsing from, but not the name of person who is browsing). In such an example Google will analyse the number of users for us, but the relevant cookies do not reveal their identities.

By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. Google Analytics, its purpose and function are further explained on the Google Analytics website.