

# **GSX Group Cookies Policy**

We use cookies on our websites (our website, or our websites) for a number of purposes. They help us to provide you with a good experience when you browse our website and allow us to improve our site. By continuing to browse the website, you are agreeing to our use of cookies.

### 1. WHAT ARE COOKIES, WHY AND HOW WE USE THEM

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

**Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of the ebilling services.

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. This helps us to improve the way our website works, for example, by ensuring that users find what they are looking for easily.

**Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

**Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. 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.

You can find more information about the individual cookies we use and the purposes for which we use them below. We do not use all cookies on all of other websites.

A cookie is a small file placed onto your device that enables GSX Group websites features and functionality.

You can find out more information about cookies at www.allaboutcookies.org.

Cookies enable us to identify your device, secure your access to GSX Group Accounts Centre website, and even help us know if someone attempts to access your account from a different device. Cookies also enable you to easily share content.

We use cookies on our site. Any browser visiting these sites will receive cookies from us.



## 2. CATEGORIES OF USE/DESCRIPTION

#### **Authentication**

If you're signed in to GSX Group websites, cookies help us show you the right information and personalize your experience.

### Security

We use cookies to enable and support our security features, and to help us detect malicious activity that may result in a data breach and violations to our Privacy Policy.

# Preferences, features and services

Cookies can tell us which language you prefer and what your communications preferences are. They can help you fill out forms on GSX Group of companies websites more easily. They also provide you with features, insights, and customized content.

## Performance, Analytics and Research

Cookies help us learn how well our site and plugins perform in different locations. We also use cookies to understand, improve, and research products, features, and services, including when you access our websites from other websites, applications, or devices such as your work computer or your mobile device.

# Advertising, recommendations, insights and measurement

We, and third-party solution providers, may use cookies to show you relevant advertising both on and off GSX Group Accounts Centre website, also to evaluate our website's advertising and promotional effectiveness, gain insight into the nature of our audience so we can tailor our content and marketing strategy accordingly, as well as to provide interest-based advertising on our websites and on other websites which are tailored to your interests and preferences.



## 3. WHAT IS DO NOT TRACK (DNT)?

DNT is a concept that has been promoted by regulatory agencies such as the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing Internet users to control the tracking of their online activities across websites by using browser settings. The World Wide Web Consortium (W3C) has been working with industry groups, Internet browsers, technology companies, and regulators to develop a DNT technology standard. While some progress has been made, it has been slow. No standard has been adopted to this date. As such, we does not generally respond to "do not track" signals.

#### 4. HOW ARE COOKIES USED FOR ADVERTISING PURPOSES?

Cookies and other ad technology help us understand and improve our service. They also help us provide aggregated auditing, research, and reporting for advertisement purposes, understand and improve our service.

If you are logged in on any of our websites or another service that references this Cookie Policy or browsing a third party partner site of GSX Group Accounts Centre website and one of our cookies on your device identifies you, your usage (such as your browsing behaviour) and log data (such as your IP address), will be associated by us with your account. We also use aggregate data from third parties and data from your profile and website activity.

If you log in/register/subscribe to our newsletter or contact us through our website on a browser, GSX Group may still continue to log your interaction with our services on that browser for up to 30 days in order to generate usage analytics for our services.

Unless you clear these cookies from your browser, we may use this information to:

- provide more relevant, interest-based advertising;
- detect and defend against fraud and other risks to protect users and partners;
- improve our products and service.



#### 5. THIRD-PARTY COOKIES

The cookie table below lists some of the third party cookies on our website. Please note that the names of cookies may change over time. Please also note that third-party website you may be redirect to probably use other third-party cookies. If you want to learn more about third party cookies used in our website, contact us as per your convenience.

**Google Analytics** – we may use Google Analytics to collect data about website usage. This data does not include personally identifiable information. You can view the Google Privacy Policy here: www.google.com/policies/privacy/

**Google reCAPTCHA** – We may use reCAPTCHA solution for preventing spam requests on our public contact forms, and user signup pages.

**-cloudflare** — we may use to cloudflare to identify individual clients behind a shared IP address and apply security settings on a per-client basis. You can view the cloudflare Privacy Policy here: <a href="https://www.cloudflare.com/cookie-policy/">https://www.cloudflare.com/cookie-policy/</a>

**Facebook** – we may use a Facebook pixel to obtain information regarding the activities that users engage in while visiting our web pages. For information on Facebook's Privacy and Cookie policy, visit <a href="https://www.facebook.com/policies/cookies/">https://www.facebook.com/policies/cookies/</a>

**Doubleclick.net** – We may gather analytical data about how you engage with our advertising to improve advertising relevance and website performance. The cookie does NOT in any way identify you or give access to your device.

**YouTube** – We may embed videos from our official YouTube channel using YouTube's privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode. For more information visit: https://support.google.com/youtube/answer/171780?hl=en-GB

#### 6. CONTROLLING AND REMOVING COOKIES

We have a legitimate interest to use cookies so that we can show you adverts we believe you might be interested in, to control the number of times you see an advert and to measure the effectiveness of a campaign. We advertise on our site and in our newsletters to help keep the content free for our audiences.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. Most browsers allow you to control cookies through their settings preferences, you do this through your browser settings. Each browser is a little different, so look at your browser's help menu to learn the correct way to modify your cookies.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. For further information on how to do this visit <a href="http://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html">http://www.allaboutcookies.org/manage-cookies/stop-cookies-installed.html</a>

You can also clear cookies previously installed on your computer, how to accomplish this changes from browser to browser and you can find how to perform the clearance of cookies in your browser here: <a href="http://www.allaboutcookies.org/manage-cookies/clear-cookies-installed.html">http://www.allaboutcookies.org/manage-cookies/clear-cookies-installed.html</a>

However, please note that if you limit the ability of GSX website to set cookies, you may worsen your overall user experience and won't be able to access some of the website's functionalities.



#### 7. CHILDREN

GSX website is not intended for children under 16 years of age. If we learn we have collected or received Personal Data from a child under 16 we will delete that information straight away. If you believe we might have any information from or about a child under 16, please contact us immediately at privacy@gsxgroup.gi.

# 8. CHANGES TO OUR COOKIES POLICY

Any changes we may make to our cookies policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our cookies policy.

# 9. COMPANIES, WEBSITES WITHIN SCOPE OF THIS POLICY AND THIRD-PARTY COOKIES USED

COMPANY	WEBSITE	THIRD-PARTY COOKIES
GSX Group	www.gsxgroup.gi	Google reCAPTCHA Google Analytics _cloudflare
	account.gsxgroup.gi	Google reCAPTCHA Google Analytics _cloudflare
GSX Limited	www.gsx.gi	Google reCAPTCHA Google Analytics _cloudflare Facebook
GBX	gbx.gi	Google reCAPTCHA Google Analytics _cloudflare Facebook Doubleclick.net YouTube
	exchange.gbx.gi	Google reCAPTCHA Google Analytics _cloudflare Facebook Doubleclick.net YouTube
	platform.gbx.gi	Google reCAPTCHA Google Analytics _cloudflare Facebook Doubleclick.net YouTube
BIC	www.bic.gi	Google reCAPTCHA Google Analytics _cloudflare
Juno	www.juno.gi	Google reCAPTCHA Google Analytics _cloudflare
Hashstacs	hashstacs.io	Google reCAPTCHA Google Analytics _cloudflare



#### 10. CONTACT

Questions, comments and requests regarding this cookie policy are welcomed.

We have appointed a data protection officer who is responsible for overseeing questions in relation to this cookies policy. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

If you have any questions about this privacy notice or any question related to how we manage your personal data, please contact us in the following ways:

E-mail: <a href="mailto:privacy@gsxgroup.gi">privacy@gsxgroup.gi</a>

Postal address: Suite 741, Europort Gibraltar, GX11 1AA

Phone: +350 200 67822

This cookies policy was last updated on 31 July 2019