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### 1. INTRODUCTION

This Cookie Policy document expands on how OANDA Coinpass Limited ("Coinpass") use cookies when you visit our websites ([www.coinpass.com](http://www.coinpass.com) or [www.crypto.oanda.com](http://www.crypto.oanda.com)). The policy explains what these technologies are and why Coinpass use them, as well as your rights as a user to control Coinpass' use of them.

In some cases, Coinpass and Coinpass Payments may use cookies and similar technologies to collect personal information, or information that becomes personal information if Coinpass combine it with other information. In such cases the Coinpass Privacy Policy will apply in addition to this Cookie Policy.

### 2. DEFINITION OF 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 recognise 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 recognise your computer both when it visits the Coinpass website and when it visits certain other websites and/or mobile apps.

Coinpass 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, Coinpass also treat these identifiers as personal information. If Coinpass combine non-personal information with personal information, the combined information will be treated as personal information for as long as it remains combined.

### 3. OUR USE OF COOKIES

When you access Coinpass services, Coinpass or third-party companies, Coinpass may place cookies on your computer or other device. These technologies help Coinpass better understand user behaviour and inform Coinpass about which parts of Coinpass websites people have visited. Coinpass use first party and third-party cookies to recognise you as a Coinpass customer, customise services, content, and 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.

Coinpass 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 Coinpass. Coinpass 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.

COOKIES THAT WE USE	
Strictly Necessary Cookies	These cookies are essential because they enable you, the user, to move around Coinpass Services and use certain features. 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 Coinpass Services work.
Functionality Cookies	These cookies allow Coinpass to remember the choices you make and to tailor our Services so Coinpass 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	Coinpass use session cookies when you access Coinpass website or content. Session cookies expire and no longer have any effect when you log out of your account or close your browser.

### 4. HOW LONG WILL COOKIES REMAIN?

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).

### 5. OTHER SIMILAR TECHNOLOGIES THAT WE ADOPT

In addition to cookies, Coinpass may use other similar technologies, like web beacons to track users of Coinpass 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

stores on a user's computer's hard-drive or device, clear gifs are embedded invisibly on web pages and are about the size of the fullstop at the end of this sentence. Coinpass 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 Coinpass's Services by informing us which content is effective. Coinpass may also use so-called "Flash Cookies" (also known as "Local Shared Objects or "LSOs") to collect and store information about your use of Coinpass services, fraud prevention and for other site operations.

## **6. ADVERTISING COOKIES**

Coinpass 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. These cookies remember that you have visited a website and this information may be shared with other organisations, such as advertisers. This means that after you have been to Coinpass's websites, you may see some advertisements about Coinpass's Services elsewhere on the Internet.

## **7. MANAGEMENT OF COOKIES**

You, the user, have the right to decide whether to accept cookies. You can exercise your preferences in relation to cookies served on Coinpass sites please visit [coinpass.com](http://coinpass.com).

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, coinpass 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, coinpass 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 <a href="http://www.aboutads.info/choices">http://www.aboutads.info/choices</a> . 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 <a href="http://www.aboutads.info/consumers">http://www.aboutads.info/consumers</a> .
Do Not Track	These cookies allow Coinpass to remember the choices you make and to tailor our Services so Coinpass can provide relevant content to you. For example, a functionality cookie can remember your preferences (e.g., country or language selection), or your username.

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
	Coinpass services or online content.

## 8. POLICY UPDATES

Coinpass may update this Cookie Policy from time to time to reflect, for example, changes to the cookies Coinpass use or for other operational, legal or regulatory reasons. If Coinpass do, you will be notified when you first visit Coinpass' website after the change