

Cookie Policy

Effective Date: 25 December 2025 **Version:** 1.0.1

1. Introduction

This Cookie Policy explains how Finerty Data Limited trading as Finerty ("Finerty," "we," "us," or "our") uses cookies and similar tracking technologies on our website (<https://www.finertydata.com> and <https://finerty.app>) and our Digital Consent Letter platform.

By using our website, you consent to the use of cookies in accordance with this policy. You can manage your cookie preferences at any time through our cookie consent tool or your browser settings.

2. What Are Cookies?

Cookies are small text files that are stored on your device (computer, tablet, or mobile phone) when you visit a website. They help websites recognise your device and remember information about your visit, such as your preferences, login status, and browsing behaviour.

2.1 Types of Cookies by Duration

Session Cookies Temporary cookies that are deleted when you close your browser. They are used to maintain your session as you navigate between pages.

Persistent Cookies Cookies that remain on your device for a set period or until you delete them. They remember your preferences and actions across multiple visits.

2.2 Types of Cookies by Source

First-Party Cookies Set by the website you are visiting ([finertydata.com](https://www.finertydata.com) or finerty.app). We control these cookies directly.

Third-Party Cookies Set by external services we use (e.g., analytics providers). These cookies are controlled by the respective third parties.

3. Cookies We Use

3.1 Strictly Necessary Cookies

These cookies are essential for our website to function properly. They cannot be disabled without affecting core functionality. **No consent is required** for these cookies under the ePrivacy Directive.

Cookie Name	Purpose	Duration	Provider
cc_cookie	Stores your cookie consent preferences	12 months	First-party
session_id	Maintains your authenticated session (platform only)	Session	First-party
csrf_token	Protects against Cross-Site Request Forgery attacks	Session	First-party
__cf_bm	Cloudflare bot management (if used)	30 minutes	Cloudflare

Legal Basis: These cookies are strictly necessary for service delivery (GDPR Article 6(1)(b)) and security (GDPR Article 6(1)(f)). Consent is not required under ePrivacy Directive Article 5(3).

3.2 Analytics Cookies

These cookies help us understand how visitors interact with our website, which pages are most popular, and how we can improve user experience. **Consent is required** before these cookies are set.

Cookie Name	Purpose	Duration	Provider
(Currently none)	We do not currently use analytics cookies	-	-

Future Implementation: If we implement analytics (e.g., Plausible Analytics), we will update this table and request your consent before setting any analytics cookies.

Note: We are considering privacy-focused analytics solutions that do not require cookies. If implemented, this policy will be updated accordingly.

3.3 Marketing Cookies

These cookies are used to deliver personalised advertisements and track marketing campaign effectiveness. **Consent is required** before these cookies are set.

Cookie Name	Purpose	Duration	Provider
(Currently none)	We do not currently use marketing cookies	-	-

Future Implementation: If we add marketing cookies (e.g., Google Ads, LinkedIn), we will update this table and request explicit consent.

3.4 Third-Party Cookies (Platform Only)

When using our LOA platform, you may encounter cookies from integrated services:

DocuSign (Electronic Signature Provider)

During the LOA signing process, DocuSign may set cookies to:

- Maintain your signing session
- Prevent fraud and ensure security
- Remember signing preferences

These cookies are set only when you actively engage in a signing workflow. See DocuSign's privacy policy at <https://www.docusign.com/privacy> for more information.

4. Cookie Consent Management

4.1 First Visit

When you first visit our website, you will see a cookie consent banner. This banner allows you to:

- **Accept All:** Enable all optional cookies (analytics, marketing)
- **Reject All:** Disable all optional cookies (only necessary cookies used)
- **Manage Preferences:** Choose which cookie categories to enable

No optional cookies are set until you make a choice. We do not use "implied consent" or pre-checked boxes.

4.2 Changing Your Preferences

You can change your cookie preferences at any time:

1. **Via Our Website:** Click "Cookie Preferences" in the website footer
2. **Via Browser Settings:** See Section 5 below
3. **Via Email:** Contact contact@finertydata.com

When you change preferences:

- Newly rejected cookies will be deleted immediately
- Existing tracking will stop for rejected categories
- Your new preferences will be saved for 12 months

4.3 Consent Withdrawal

You have the right to withdraw consent at any time. Withdrawal is as easy as giving consent:

1. Click "Cookie Preferences" in the footer
2. Deselect the categories you wish to withdraw consent for
3. Click "Save Preferences"

Withdrawing consent does not affect the lawfulness of processing based on consent before withdrawal.

5. Managing Cookies via Browser Settings

You can also control cookies through your browser settings. Please note that disabling strictly necessary cookies may impair website functionality.

5.1 Browser-Specific Instructions

Google Chrome

1. Click the three-dot menu > Settings
2. Click "Privacy and security" > "Cookies and other site data"
3. Choose your preferred cookie settings

Mozilla Firefox

1. Click the menu button > Settings

2. Click "Privacy & Security"
3. Under "Cookies and Site Data," choose your settings

Apple Safari

1. Click Safari > Preferences
2. Click "Privacy"
3. Under "Cookies and website data," choose your settings

Microsoft Edge

1. Click the three-dot menu > Settings
2. Click "Cookies and site permissions" > "Cookies and site data"
3. Choose your preferred settings

5.2 Do Not Track (DNT)

Some browsers offer a "Do Not Track" (DNT) signal that indicates you do not wish to be tracked.

Our Response to DNT: We honour Do Not Track signals. If your browser sends a DNT signal, we will:

- Not set optional cookies (analytics, marketing)
- Treat your visit as if you selected "Reject All" on our consent banner

6. Local Storage and Similar Technologies

In addition to cookies, we use other client-side storage technologies:

6.1 Local Storage

- **Purpose:** Store non-sensitive user preferences (e.g., theme preferences, UI state)
- **Data:** JSON objects containing preference settings
- **Duration:** Persistent until cleared
- **Clearing:** Browser settings > Clear browsing data > Local storage

6.2 Session Storage

- **Purpose:** Temporary data for current session (e.g., form state, navigation)
- **Data:** Non-sensitive application state

- **Duration:** Until browser tab/window is closed
- **Clearing:** Automatic when tab is closed

6.3 IndexedDB

- **Purpose:** Currently not used on marketing website
- **Platform Use:** May be used on Digital Consent letter platform for offline capability caching

7. Cookie Duration

Category	Typical Duration	Purpose
Session Cookies	Until browser closes	Maintain state during visit
Consent Cookies	12 months	Remember your consent choice
Authentication	Session or up to 30 days (remember me)	Keep you logged in
Analytics	Not currently used	-
Marketing	Not currently used	-

8. Updates to This Cookie Policy

We may update this Cookie Policy to reflect:

- Changes in our cookie usage
- New regulatory requirements
- Implementation of new technologies

Notification Process:

- Material changes will be highlighted in a banner on our website
- We will update the "Last Updated" date
- For significant changes, we may request consent renewal

We recommend reviewing this policy periodically to stay informed about our use of cookies.

9. Contact Us

If you have questions about our use of cookies or this policy, please contact:

Email: contact@finertydata.com

Data Protection Officer: contact@finertydata.com

Postal Address: Data Protection Officer Finerty Data Limited The CHQ Building North Wall Quay Dublin 1, D01 Y6H7 Ireland

10. Regulatory Compliance

This Cookie Policy is designed to comply with:

Regulation	Jurisdiction	Key Requirements
ePrivacy Directive (2002/58/EC as amended)	European Union	Prior consent for non-essential cookies
GDPR (Regulation EU 2016/679)	European Union	Lawful basis, data subject rights
Irish Data Protection Act 2018	Ireland	GDPR implementation
UK GDPR	United Kingdom	Post-Brexit GDPR equivalent
PECR (Privacy and Electronic Communications Regulations 2003)	United Kingdom	Cookie consent requirements

10.1 Key Compliance Measures

- **Consent Before Cookies:** We do not set optional cookies until you provide consent
- **Granular Consent:** You can choose which categories of cookies to accept
- **Easy Withdrawal:** Consent can be withdrawn as easily as it was given
- **Clear Information:** This policy provides transparent information about our cookies
- **No Cookie Walls:** Website content is accessible without accepting optional cookies

Appendix: Cookie Audit Summary

Last Audit Date: 24 December 2025 Audit Method: Manual review

Category	Count	Consent Required
Strictly Necessary	3-4	No
Analytics	0	Yes (if added)
Marketing	0	Yes (if added)
Total	3-4	-

Notes:

- Current cookie usage is minimal, focused on essential functionality
- No third-party tracking cookies in use on marketing website
- DocuSign cookies may appear during LOA signing workflows (platform only)

We will update this audit summary whenever cookies are added or removed.

Last Updated: 24 December 2025