



COOKIE POLICY

5 September 2022

1. INTRODUCTION

1.1. Please read this cookie policy ("**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:

1.1.1. [Privacy Notice](#) (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 data and details of how to contact us and supervisory authorities if you have a complaint);

1.1.2. [Website Terms of Use](#); and

1.1.3. if applicable to you, the [Borrower Platform Terms and Conditions](#).

2. WHO ARE WE?

2.1. Fluro Platform Limited (8302549) ("**Fluro**", "**Our**", "**Us**" and "**We**") is authorised and regulated by the Financial Conduct Authority (723151).

2.2. Our registered office and place of business is 55 Old Broad Street, London, England EC2M 1RX.

2.3. We are registered with the Information Commissioner's Office (ZA002001).

2.4. We are a member of Cifas and Innovate Finance.

3. WHAT ARE OUR CONTACT DETAILS?

If you have any queries about this Policy, how we manage cookies, or about exercising any of your rights, you may contact the Data Protection Officer using the following contact details:

Email: *DPO@fluro.co.uk*

Post: *DPO
Fluro
55 Old Broad St
London
EC2M 1RX*

Telephone: *020 7096 8512*

4. THIRD-PARTIES

Our Website or any communications with you may, from time to time, contain links to and from the websites of our business partners and affiliates. If you follow a link, you should note that these websites may also use cookies and have their own privacy notices/cookie policies. We do not accept any responsibility or liability for these notices. Please check these notices before submitting personal data or other information to these websites.

5. OUR WEBSITE



This Policy relates to your use of our website (www.fluro.co.uk) or any pages arising from or connected to the stated domain, including any sub-domains, referred to as the "Website") or on the Fluro Platform (available to Fluro Borrowers).

6. COOKIES

- 6.1. A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or another electronic device) when you use our website.
- 6.2. We use cookies on our website. These help us *recognise you and your device and store some information about your preferences or past actions*. For example, we may monitor e.g *how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of your internet service provider*. This information helps us to *build a profile of our users* and provide better services. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.
- 6.3. We will ask for your consent to place cookies or other similar technologies on your device, except where they are essential for us to provide you with a service that you have requested.
- 6.4. You can withdraw any consent to the use of cookies or manage any other cookie preferences by using our cookie management tool.
- 6.5. For further information on cookies generally, including how to control, manage them or disable them visit the guidance on cookies published by the Information Commissioner's Office or www.aboutcookies.org

7. OUR COOKIES

The table below provides more information about the cookies we use and why:

Name	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	Third Party
AWSALBCORS	This cookie is managed by AWS and is used for load balancing.	Strictly Necessary	No
AWSALB	AWS ELB application load balancer	For performance	No
_dc_gtm_UA-xxxxxxx	This cookie is associated with sites using Google Tag Manager to load other scripts and code into a page. Where it is used it may be regarded as Strictly Necessary as without it, other	For performance	No



Name	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	Third Party
AWSALBCORS	<p>scripts may not function correctly. The end of the name is a unique number which is also an identifier for an associated Google Analytics account.</p> <p>This cookie is managed by AWS and is used for load balancing.</p>	For performance	No
AWSALB	AWS ELB application load balancer	For performance	No
_hjSessionUser_350937	Hotjar cookie that is set when a user first lands on a page with the Hotjar script. It is used to persist the Hotjar User ID, unique to that site on the browser. This ensures that behavior in subsequent visits to the same site will be attributed to the same user ID.	For performance	No
_ga	This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports. By default it is set to expire after 2 years, although this is customisable by website owners.	For performance	No



Name	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	Third Party
_hp2_hld	This cookie is used to determine which domain a cookie can be set on, since public suffix domains block setting cookies at the top level.	For performance	No
_hjIncludedInPageviewSample	This cookie is set to let Hotjar know whether that visitor is included in the data sampling defined by your site's pageview limit.	For performance	No
_hp2_hld	This cookie is used to determine which domain a cookie can be set on, since public suffix domains block setting cookies at the top level.	For performance	No
_hjSession_350937	A cookie that holds the current session data. This ensures that subsequent requests within the session window will be attributed to the same Hotjar session.	For performance	No
_hjAbsoluteSessionInProgress	This cookie is used by HotJar to detect the first pageview session of a user. This is a True/False flag set by the cookie.	For performance	No
_hjFirstSeen	Identifies a new user's first session on a website, indicating whether or not Hotjar's seeing this user for the first time.	For performance	No
_hjTLDDTest	When the Hotjar script executes we try to determine the most generic cookie path we should use, instead of the page hostname. This is done so that cookies can be shared across subdomains (where	For performance	No



Name	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	Third Party
_ga	<p>applicable). To determine this, we try to store the _hjTLDDTest cookie for different URL substring alternatives until it fails. After this check, the cookie is removed.</p> <p>This cookie name is associated with Google Universal Analytics - which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports. By default it is set to expire after 2 years.</p>	For performance	No
_hjIncludedInSessionSample	<p>This cookie is set to let Hotjar know whether that visitor is included in the data sampling defined by your site's daily session limit.</p>	For performance	No
_gat	<p>This cookie name is associated with Google Universal Analytics, according to documentation it is used to throttle the request rate - limiting the collection of data on high traffic sites. It expires after 10 minutes.</p>	For performance	No
_hjTLDDTest	<p>When the Hotjar script executes we try to determine the most generic cookie path we should use, instead of the</p>	For performance	No



Name	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	Third Party
	page hostname. This is done so that cookies can be shared across subdomains (where applicable). To determine this, we try to store the _hjTLDTst cookie for different URL substring alternatives until it fails. After this check, the cookie is removed.		
_gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	For performance	No
JSESSIONID	This domain is controlled by New Relic, which provides a platform for monitoring the performance of web and mobile applications.	Targeting	No
_dlt	This cookie is associated with Google's real time bidding advertising exchange. The main purpose of this cookie is targeting.	Targeting	No
_hp2_ses_props.##### ####	This cookie is used by Heap Analytics to track user behavior on the website. Cookies in this domain have lifespan of 2 years.	Targeting	No
_hp2_id.#####	This cookie is used by Heap Analytics to track user behavior on the website. Cookies in this domain have lifespan of 2 years.	Targeting	No
__qca	This is a cookie usually associated with Quantcast, a digital advertising company. They provide website rankings, and the data they	Targeting	No



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	collect is also used for audience segmentation and targeted advertising.		
_fbp	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers	Targeting	No
_dlt	This cookie is associated with Google's real time bidding advertising exchange. The main purpose of this cookie is targeting.	Targeting	No
mc	This domain is owned by Quantcast. The main business activity is: Market and Audience Segmentation, Targeted advertising services	Targeting	Yes - quantserve.com
lastpage	Internal tracking system	Non-essential	No
lastpage	Internal tracking system	Non-essential	No
lwts	Internal tracking system	Non-essential	No
cp_preview	Internal tracking system	Non-essential	No
cookies_settings	Internal tracking system	Non-essential	No
_hjIncludedInPageviewSample	Creating video recordings and heatmaps based on the user's activity	Non-essential	Yes - script.hotjar.com
_hjIncludedInSessionSample	Creating video recordings and heatmaps based on the user's activity	Non-essential	Yes - script.hotjar.com

8. THE CONSEQUENCES OF TURNING OFF ALL COOKIES



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.

9. THIRD-PARTY ACCESS

The cookies we use will only be accessed by us and those third parties named in the table above for the purposes referred to in this cookie policy. Those cookies will not be accessed by any other third party.

10. HOW DO YOU MAKE A COMPLAINT?

10.1. If you believe that your data protection rights may have been breached, you can:

- contact Fluro via your Fluro Account (if you have one) on the Website or using the details in our [Privacy Notice](#). Details of our Complaints Procedure can be found at www.fluro.co.uk/complaints
- if we cannot resolve your concern, you may lodge a complaint with the applicable supervisory authority or seek a remedy through the courts. Please visit the UK Information Commissioner's Office website for more information on how to report a concern. Note, you can also do this without first complaining to us.

11. WHAT ABOUT CHANGES?

11.1. We may change any provision of this Cookie Policy at any time without your permission.

11.2. Where we make changes to this Cookie Policy, our updated Cookie Policy will be displayed on our Website or we will notify you by sending you a notification message within your Fluro Account or by emailing you.