

SWC Smart

COOKIE POLICY

— v1 FINAL · INLD LIMITED

UK PECR 2003 · UK GDPR · EU ePrivacy Directive · ICO Cookie Guidance 2023

Revised: April 2025

This Policy explains what cookies and tracking technologies the SWC Smart platform uses, for what purposes, and how you can manage them.

1. WHAT COOKIES ARE AND WHY IT IS IMPORTANT

Cookies are small text files that are stored on your device (computer, smartphone, tablet) when you visit a website. We also use similar technologies, such as tracking pixels, web beacons, localStorage, sessionStorage, and tags.

The use of non-essential cookies on this website requires your prior, freely given, specific, informed, and unambiguous consent in accordance with Regulation 6 of the PECR 2003 and the UK GDPR.

KEY PRINCIPLE: Non-essential cookies (analytical, marketing) are NOT uploaded until your explicit consent is obtained through the cookie banner. Continuing to browse the site, closing the banner without making a selection, or implied consent do not constitute valid consent. You can accept or reject each category of non-essential cookies individually. Opting out of non-essential cookies does not affect the access to the main functions of the Platform.

2. WHO MANAGES COOKIES ON THIS SITE

The data controller for the data collected via cookies is INLD LIMITED (SWC Smart), company number 12040493, address: Redhill Marina, Ratcliffe-On-Soar, Nottingham, England, NG11 0EB.

For questions about cookies: privacy@swcsmart.com

3. LANGUAGE PRIORITY

This Cookie Policy is drafted in the English language, which is the only authoritative and legally binding version. All translations into Russian and Vietnamese are provided solely for the convenience of Users. In the event of any conflict, ambiguity or discrepancy between the English version and any translation, the English version shall prevail in all respects. This clause applies

to the fullest extent permitted by applicable law. Nothing in this clause limits any mandatory consumer protection rights, including requirements for transparency, fairness or language accessibility under applicable local law.

Настоящая Политика составлена на английском языке, который является единственной авторитетной и юридически обязывающей версией. Переводы на русский и вьетнамский языки предоставляются исключительно для удобства. При расхождении между версиями приоритет во всех отношениях имеет английская версия в допустимой законом степени. Ничто в настоящем пункте не ограничивает обязательные права потребителей, включая требования к прозрачности, справедливости и доступности условий.

4. CATEGORIES OF COOKIES AND LEGAL BASES

4.1. Strictly Necessary Cookies

These cookies are necessary for the Platform to function. Authorization, security, and basic functions are impossible without them. They do not require your consent and cannot be disabled via our banner.

Legal basis: Exemption from the consent requirement pursuant to Regulation 6(4) of the PECR 2003 (strictly necessary exemption). Consent is not required for these cookies, as they are necessary to provide a service that the user has explicitly requested.

Name / Provider	Type	Objective	Holding Period	Is it possible to turn it off?
session_id / SWC Smart	Session	User authorization, session maintaining	Until you close your browser	No
csrf_token / SWC Smart	Session	Protection against CSRF attacks	Until you close your browser	No
lang_pref / SWC Smart	Persistent	Saving the selected interface language	1 year	No
cookie_consent / SWC Smart	Persistent	Storing your cookie preferences	1 year	No
checkout_session / SWC Smart	Session	Maintaining the checkout session	Until you close your browser	No

4.2. Analytics Cookies

These cookies help us understand how the Platform is used on an aggregate level. They are not intended to directly identify the user, but may involve the processing of personal data, such as IP address and online identifiers.

Legal basis: your consent (PECR Regulation 6 + UK GDPR Article 6(1)(a)). These will only be uploaded after you have given your explicit consent.

Name / Provider	Type	Objective	Holding Period	Provider Policy
_ga, _ga_* / Google Analytics 4	Persistent	Analysis of traffic, sources, and user behavior. They are not intended to directly identify the user, but may involve the processing of personal data (IP address, online identifiers) in aggregated form. The IP address is partially anonymized.	Up to 2 years (renewed at follow-up visits)	policies.google.com
_gid / Google Analytics	Persistent	Distinguishing users for analytics	24 hours	policies.google.com
_gat / Google Analytics	Session	Limiting the request rate	1 minute	policies.google.com

4.3. Marketing / Advertising Cookies

These cookies are used to display relevant ads and for retargeting. They help us and our partners show you ads that match your interests on other platforms.

Legal basis: your explicit consent (PECR Regulation 6 + UK GDPR Article 6(1)(a)). These are uploaded only after explicit consent is given. You have the right to withdraw your consent at any time.

Name / Provider	Type	Objective	Holding Period	Provider Policy
_fbp, _fbc / Meta (Facebook)	Persistent	Retargeting on Facebook/Instagram, conversion tracking	90 days	facebook.com/privacy
_gcl_aud / Google Ads	Persistent	Google Retargeting, Conversion Tracking	90 days	policies.google.com
IDE / Google (DoubleClick)	Persistent	Displaying personalized ads	13 months	policies.google.com

4.4. Functional Cookies

These cookies remember your preferences to improve the user experience, but they are not strictly necessary.

Legal basis: your consent (PECR Regulation 6 + UK GDPR Article 6(1)(a)).

If the tools listed in this section are used for analytics, tracking, or marketing purposes, they are classified as analytics or marketing cookies and require the appropriate level of consent.

Name / Provider	Type	Objective	Holding Period	Can I turn it off?
intercom-* / Intercom	Persistent	Support Chat: Remembering Users Across Sessions	9 months	Yes — via the banner
hubspot-* / HubSpot	Persistent	CRM: User Identification for Personalization	13 months	Yes — via the banner

5. TECHNOLOGIES SIMILAR TO COOKIES

5.1. Tracking Pixels / Web Beacons

We use Facebook (Meta Pixel) and Google (Google Tag) pixels to measure the effectiveness of our advertising campaigns. Pixels are uploaded only with your consent to marketing cookies.

5.2. localStorage / sessionStorage

We use browser-based localStorage and sessionStorage to improve the user experience, for example, to save your course progress, language settings, and interface preferences. These technologies may be classified as cookies under the PECR. We use them exclusively for strictly necessary or functional purposes where you have explicitly requested the relevant functionality. Marketing or profiling data is not stored in localStorage without your prior consent. In cases where the use of localStorage is not strictly necessary, it is enabled only after you have consented to the use of functional cookies.

5.3. Advanced Tracking Technologies

The Company does not use advanced probabilistic fingerprinting or cross-site tracking technologies without the User's prior consent. Marketing cookies (Meta Pixel, Google Ads), which technically enable cross-site tracking, are uploaded only after the User has given explicit consent via the cookie banner.

6. HOW WE OBTAIN YOUR CONSENT

When you visit swcsmart.com for the first time, a Cookie-banner appears with three options:

- "Accept All" — you consent to all categories of cookies (strictly necessary + analytical + marketing + functional).
- "Only Essential" — you reject all non-essential cookies with a single click. Access to the main functions of the Platform remains available.
- "Customize" — you can select the cookie categories yourself, with a separate checkbox for each category.

The cookie banner presents options to "Accept all" and "Reject non-essential / Necessary only" with equal prominence, visibility and ease of selection. No option is pre-selected.

Кнопки «Принять все» и «Только необходимые» отображаются с одинаковой заметностью, видимостью и удобством выбора. Ни одна опция не предустановлена.

IMPORTANT: The banner does not include pre-selected checkboxes for non-essential categories. Closing the banner without making a selection or continuing to use the site does NOT constitute consent. Strictly necessary cookies cannot be disabled — they are necessary for the website to function. Opting out of non-essential cookies does not affect the access to the main functions of the Platform.

We keep a record of your consent (consent log): the timestamp, the selection you made, and the banner version. This record is kept to demonstrate compliance with the PECR.

The banner appears whenever a new device or browser is used and is displayed again after 12 months, or sooner if the Policy is updated in a way that affects the use of cookies.

7. CHANGING OR WITHDRAWING THE CONSENT

You are entitled to change your cookie preferences at any time using the following methods:

- Via the cookie settings on the website: the "Cookie Settings" link in the footer of every page on <https://swcsmart.com>
- Through your browser settings: Most browsers allow you to view, block, and delete cookies. Below are the links to the instructions of the main browsers.
- Via the opt-out tools: optout.aboutads.info (US) and youronlinechoices.eu (EU).

Browser	Instructions for managing cookies
Google Chrome	support.google.com/chrome/answer/95647
Mozilla Firefox	support.mozilla.org/kb/cookies-information-websites-store-on-your-computer
Apple Safari	support.apple.com/guide/safari/manage-cookies-sfri11471
Microsoft Edge	support.microsoft.com/microsoft-edge/delete-cookies-63d55c39
Opera	help.opera.com/en/latest/web-preferences/#cookies

Withdrawal of consent does not affect the lawfulness of processing carried out prior to such withdrawal. If you disable certain cookies, the functionality of the website may be limited.

8. COOKIE RETENTION PERIODS

The retention periods are listed in the tables in Section 4. General principles:

- Session cookies are automatically deleted when you close your browser.
- Persistent cookies remain stored until they expire or are manually deleted.
- Cookie consent is stored for 1 year. After 12 months, the Cookie-banner is displayed again to obtain new consent. The banner will also be displayed again in the event of a significant update to this Policy that affects the use of cookies.

9. THIRD PARTIES AND DATA TRANSFER

A number of cookies are set by third parties (Google, Meta, etc.) on our website. These companies process data in accordance with their privacy policies, which are linked in the tables in Section 4.

Data collected through third-party cookies may be transferred to the United States. Data is transferred in accordance with the Standard Contractual Clauses (SCCs) and/or the UK IDTA. Some providers may use the EU–US Data Privacy Framework (DPF). Where applicable, DPF compliance is confirmed and documented in the provider registry and cross-border transfer records of the Company.

The Company does not sell cookie to third parties for advertising purposes other than those described above.

10. COOKIES AND PERSONAL DATA

Some cookies (such as IP addresses and device identifiers) may be qualified as personal data under the UK GDPR and the EU GDPR. Such data is processed in accordance with our Privacy Policy.

Full procedure for processing personal data: <https://swcsmart.com/legal/privacy-policy>

For questions regarding data protection: privacy@swcsmart.com

11. DO NOT TRACK (DNT) AND GLOBAL PRIVACY CONTROL (GPC)

Currently, there is no single mandatory standard for interpreting the “Do Not Track” (DNT) signal of the browser. The SWC Smart platform does not change its behavior when it receives a DNT signal.

Global Privacy Control (GPC) is a new standard developed to replace DNT. The platform monitors the development of the GPC standard and undertakes to respect this signal in accordance with applicable law as it is implemented. To manage tracking, use the cookie settings via the consent banner or the tools described in Section 7.

12. CHANGES TO THE COOKIE POLICY

In the event of significant changes, a notice will be posted on the website and/or sent via email. Current version: <https://swcsmart.com/legal/cookie-policy>

When a policy update affects the consent obtaining order, the banner will be displayed again to obtain new consent.

13. CONTACT DETAILS

Controller: INLD LIMITED (SWC Smart), 12040493

Address: Redhill Marina, Ratcliffe-On-Soar, Nottingham, England, NG11 0EB

For questions about cookies and privacy: privacy@swcsmart.com

General support: support@swcsmart.com

ICO (UK cookie supervisory authority): ico.org.uk | 0303 123 1113

Full Privacy Policy: <https://swcsmart.com/legal/privacy-policy>

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