

# Privacy Notice: Cookies Policy

## Cookie Policy

FOUR  
BUSINESS  
SOLUTIONS



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## PRIVACY NOTICE: COOKIES AND SIMILAR TECHNOLOGIES (the “Cookie Notice”)

This Cookie Notice provides details on:

- the cookies, web beacons and similar technologies that we and our service providers may use when you visit or interact with us online; and
- your options regarding these technologies.

### SCOPE OF THIS NOTICE AND CONSENT

This Cookie Notice applies to all websites, services, messaging (e.g., email and online chat communication), and mobile-device applications that are operated by or on behalf of Four. The Cookie Notice also applies to Four-branded pages on third party platforms. For the purposes of this Cookie Notice, we refer to all such websites, services, messaging, mobile-device applications and Four-branded pages on third-party platforms as the “Four Sites”.

Four and its partners use cookies or similar technologies to analyse trends, administer the website and other Four branded platforms, track users’ movements around the website and digital properties, and to gather information about our user base as a whole. You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our website or service. By continuing to browse the Four Sites, you are agreeing to our use of cookies, web beacons and similar technologies in accordance with this Cookie Notice. If you do not agree to our use of cookies, web beacons and similar technologies in the ways described in this Cookie Notice, you should set your browser to reject all, or certain, technologies. However, if you use your browser settings to block all such technologies, you may not be able to access all or parts of the Four Sites. To fully ensure that no cookies or other technologies are used when you visit Four Sites, you also have the option to refrain from using Four Sites. For further information on how

to control cookies please read section 3 of this Cookie Notice, below

#### **When we use Cookies, Web Beacons and similar technologies:**

Cookies. We use cookies to collect information about your device, such as IP address, operating system and browser type. The types of cookies that we use are detailed below:

- **Strictly necessary.** These cookies help you to move around Four Sites. For example, if you’re required to sign into a Four Site, the cookies identify you as being signed in and remember you so that you don’t have to sign back in every time you move between Four Sites.
- **Functional.** We use these cookies so that Four Sites recall the choices you make. For example, these cookies are capable of recognizing if you’ve been to a Four Sites before, so messages intended for first-time users are not displayed to you. We may also use functional cookies to tailor content or advertisements to match your preferred interest and to avoid showing you the same advertisements repeatedly.

- Analytical. These cookies help us identify the number of unique visitors to Four Sites, whether or not those visitors are repeat visitors, and the source of Four Site traffic. For example, if there are 1,000 visits to a Four Site on a certain day, we can use cookies to discover how many of those visits were made via the same browser (same visitor). We may also use the cookie to discover whether you have visited Four Sites more than once and the source for each visit. Cookies help us to compile anonymous, aggregated statistics so that we can: better understand how people use Four Sites; improve the structure of Four Sites; and count the number of anonymous users of the Four Sites.
- Session cookies. These cookies allow us to link your actions during a particular browser session.
- Persistent cookies. These cookies allow us to recall your preferences or actions across multiple

### Four Sites

In addition to the reasons for our use of cookies detailed above, we use the information gathered from cookies – namely, IP addresses - to help diagnose problems with our servers and to administer Four Sites. Please note that the names of cookies may change over time and we will update this table accordingly.

### Web Beacons

We use web beacons to track your movements to, from and on the Four Sites to determine the effectiveness of content and advertising campaigns, particularly as they enable us to count the number of times that our advertisements and web-based email content are viewed.

### Server logs

If you arrive at a Four Sites by clicking on an advertisement that we have paid for (including a paid search engine result) or a link in an email sent from or on behalf of us, then we will capture information that tracks your visit from that link (e.g., referring URL, browser information). If you arrive at a Four Sites by clicking a source not paid for by Four, such as link in a non-paid search engine result or an unsponsored link on a third party's website, we may capture information that tracks your visit from that source, to the extent we are able to do so. We may also capture information about your computer system, such as your browser type and operating system. We may also gather certain information automatically, such as Internet protocol (IP) addresses, Internet service provider (ISP), the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data to analyse trends in the aggregate and administer the site.

### HOW TO CONTROL AND DELETE COOKIES

If you want to control the cookies that are placed on your computer or other device, you could:

- view cookies stored on your hard drive;
- choose whether or not to permit cookies to be set by default;
- delete the cookies stored on your hard drive.

Please be aware, however, that your decision to control cookies may affect your experience of the Four Sites – you may not be able to access all or parts of those sites. Turning cookies off, for instance, will prevent you from registering for, signing in to, and using many of the services on such Four Sites.

The main browsers allow you to change your cookie settings. These settings will typically be found in the 'options' or 'preferences' menu of your browser. In order to understand these settings, the following links may be helpful; otherwise you should use the 'Help' option in your browser for more details.

- Cookie settings in Internet Explorer: <https://support.microsoft.com/en-gb/search?query=change%20cookies>
- Cookie settings in Firefox: <https://support.mozilla.org/en-US/kb/Cookies>
- Cookie settings in Chrome: <https://support.google.com/chrome/answer/95647?hl=en&co=GENIE.Platform=Desktop>
- Cookie settings in Safari: <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

For information on how to use the browser of your mobile phone to amend cookie settings, you will need to refer to your handset manual. We partner with a third-party to display advertising on our website or to manage our advertising on other sites. Our third-party partner may use cookies or similar technologies in order to provide you advertising based upon your browsing activities and interests.

To learn more about advertisers' use of cookies the following links may be helpful. Please note, however, that these links will take you to third party sites over which Four has no control:

- [www.aboutcookies.org](http://www.aboutcookies.org) which contains comprehensive information on how to amend the settings of a wide variety of browsers. You will also find details on how to delete cookies from your computer as well as more general information about cookies.
- [www.youonlinechoices.com/uk/](http://www.youonlinechoices.com/uk/) If you are primarily concerned about third party cookies generated by advertisers, you can turn these off by going to the Internet Advertising Bureau's (IAB) consumer site <https://www.iabuk.com>
- [www.networkadvertising.org](http://www.networkadvertising.org) which is the website for the trade body representing advertising platforms. This body provides a one-stop place that gathers all of the opt-out controls. Please bear in mind that there are many more networks listed on this site than those used by us at Four.

### **COOKIES SET BY THIRD PARTIES ON THIRD PARTY SITES**

To enhance your experience of Four Sites, we sometimes embed photos and video content that originated from websites such as YouTube and Flickr. As a result, when you visit a page on a Four Site that features content from, for example, YouTube or Flickr, you may be presented with cookies from these websites. Four does not control the dissemination of these cookies. You should check the relevant third party's website for more information about these cookies.

### **Four Sharing Tools**

We would like to draw your attention to the fact that the Four Sites now carry embedded "share" and "like" buttons to enable visitors to Four Sites to share content through a number of social media networks. These networks may set a cookie when you are logged in to their service. Four does not control the dissemination of these cookies and you should check the relevant third-party website for more information about these.

### **CONTACT US**

If you have a question or complaint about this Cookie Notice or our information collection practices, please contact us

**Chief Privacy Officer**  
**Four Business Solutions Ltd**  
**118 Pall Mall**  
**London**  
**SW1Y 5EA**

If you have any questions, comments, or concerns about our Cookies Policy, please contact us at [info@four.co.uk](mailto:info@four.co.uk) or you may write to us at the above address:

<http://www.four.co.uk/information/legal/policy/CookiesPolicy>

As a provider of Internet access, web site hosting, and other Internet-related services, Four Business Solutions ("the Company") offers its customers (also may be known as subscribers), and their customers and users, the means to acquire and disseminate a wealth of public, private, commercial, and non-commercial information. The Company respects that the Internet provides a forum for free and open discussion and dissemination of information, however, when there are competing interests at issue, the Company reserves the right to take certain preventative or corrective actions. In order to protect these competing interests, the Company has developed an Acceptable Use Policy ("AUP"), which supplements and explains certain terms of each customer's respective service agreement and is intended as a guide to the customer's rights and obligations when utilising the Company's services. This AUP will be revised from time to time. A customer's use of the Company's services after changes to the AUP are posted on the Company's web site, [www.four.co.uk](http://www.four.co.uk), will constitute the customer's acceptance of any new or additional terms of the AUP that result from those changes.

One important aspect of the Internet is that no one party owns or controls it. This fact accounts for much of the Internet's openness and value, but it also places a high premium on the judgment and responsibility of those who use the Internet, both in the information they acquire and, in the information, they disseminate to others. When Customers obtain information through the Internet, they must keep in mind that The Company cannot monitor, verify, warrant, or vouch for the accuracy and quality of the information that the Customer may acquire. For this reason, the Customer must exercise his or her best judgment in relying on information obtained from the Internet, and also should be aware that some material posted to the Internet is sexually explicit or otherwise offensive. Because the Company cannot monitor or censor the Internet, and will not attempt to do so, the Company cannot accept any responsibility for injury to its Customer that results from inaccurate, unsuitable, offensive, or illegal Internet communications.

When the Customer disseminate information through the Internet, they also must keep in mind that the Company does not review, edit, censor, or take responsibility for any information its Customer may create. When users place information on the Internet, they have the same liability as other authors for copyright infringement, defamation, and other harmful speech. Also, because the information they create is carried over the Company's network and may reach a large number of people, Customer postings to the Internet may affect other Customers and may harm the Company's goodwill, business reputation, and operations. For these reasons, the Customer violate the Company policy and the service agreement when they, their customers, affiliates, or

subsidiaries engage in the following prohibited activities:

**Spamming** -- Sending unsolicited bulk and/or commercial messages over the Internet (known as "spamming"). It is not only harmful because of its negative impact on consumer attitudes toward the Company, but also because it can overload the Company's network and disrupt service to the Customer. Also, maintaining an open SMTP relay is prohibited. When a complaint is received, the Company has the discretion to determine from all of the evidence whether the email recipients were from an "opt-in" email list.

**Intellectual Property Violations** -- Engaging in any activity that infringes or misappropriates the intellectual property rights of others, including copyrights, trademarks, service marks, trade secrets, software piracy, and patents held by individuals, corporations, or other entities. Also, engaging in activity that violates privacy, publicity, or other personal rights of others. The Company is required by law to remove or block access to customer content upon receipt of a proper notice of copyright infringement. It is also the Company's policy to terminate the privileges of customers who commit repeat violations of copyright laws.

**Obscene Speech or Materials** -- Using the Company's network to advertise, transmit, store, post, display, or otherwise make available child pornography or obscene speech or material. The Company is required by law to notify law enforcement agencies when it becomes aware of the presence of child pornography on or being transmitted through the Company's network.

**Defamatory or Abusive Language** -- Using the Company's network as a means to transmit or post defamatory, harassing, abusive, or threatening language.

**Forging of Headers** -- Forging or misrepresenting message headers, whether in whole or in part, to mask the originator of the message.

**Illegal or Unauthorised Access to Other Computers or Networks** -- Accessing illegally or without authorisation computers, accounts, or networks belonging to another party, or attempting to penetrate security measures of another individual's system (often known as "hacking"). Also, any activity that might be used as a precursor to an attempted system penetration (i.e. port scan, stealth scan, or other information gathering activity).

**Distribution of Internet Viruses, Worms, Trojan Horses, or Other Destructive Activities** -- Distributing information regarding the creation of and sending Internet viruses, worms, Trojan horses, ping, flooding, mail bombing, or denial of service attacks. Also, activities that disrupt the use of or interfere with the ability of others to effectively use the network or any connected network, system, service, or equipment.

**Facilitating a Violation of this AUP** -- Advertising, transmitting, or otherwise making available any software, program, product, or service that is designed to violate this AUP, which includes the facilitation of the means to spam, initiation of ping, flooding, mail bombing, denial of service attacks, and piracy of software.

**Export Control Violations** -- Exporting encryption software over the Internet or otherwise, to points outside the United States.

**Usenet Groups** – The Company reserves the right not to accept postings from newsgroups where we have actual knowledge that the content of the newsgroup violates the AUP.

**Other Illegal Activities** -- Engaging in activities that are determined to be illegal, including advertising, transmitting, or otherwise making available ponzi schemes, pyramid schemes, fraudulently charging credit cards, and pirating software.

**Other Activities** -- Engaging in activities, whether lawful or unlawful, that the Company determines to be harmful to its Customer, operations, reputation, goodwill, or customer relations.

As we have pointed out, the responsibility for avoiding the harmful activities just described rests primarily with the subscriber. The Company will not, as an ordinary practice, monitor the communications of its Customer to ensure that they comply with the Company policy or applicable law. When the Company becomes aware of harmful activities, however, it may take any action to stop the harmful activity, including but not limited to, removing information, shutting down a web site, implementing screening software designed to block offending transmissions, denying access to the Internet, or take any other action it deems appropriate.

The Company also is aware that many of its customers are, themselves, providers of Internet services, and that information reaching the Company's facilities from those customers may have originated from a customer of the subscriber or from another third-party. The Company does not require its Customer who offer Internet services to monitor or censor transmissions or web sites created by customers of its Customer. The Company has the right to directly take action against a customer of a subscriber. Also, the Company may take action against the Company subscriber because of activities of a customer of the subscriber, even though the action may affect other customers of the subscriber. Similarly, the Company anticipates that the Customer who offer Internet services will cooperate with the Company in any corrective or preventive action that the Company deems necessary. Failure to cooperate with such corrective or preventive measures is a violation of the Company policy.

The Company also is concerned with the privacy of on-line communications and web sites. In general, the Internet is neither more nor less secure than other means of communication, including mail, facsimile, and voice telephone service, all of which can be intercepted and otherwise compromised. As a matter of prudence, however, the Company urges its Customer to assume that all of their on-line communications are insecure. The Company cannot take any responsibility for the security of information transmitted over the Company's facilities.

The Company will not intentionally monitor private electronic mail messages sent or received by its Customer unless required to do so by law, governmental authority, or when public safety is at stake. The Company may, however, monitor its service electronically to determine that its facilities are operating satisfactorily. Also, the Company may disclose information, including but not limited to, information concerning a subscriber, a transmission made using our network, or a web site, in order to comply with a court order, subpoena, summons, discovery request, warrant, statute, regulation, or governmental request. The Company assumes no obligation to inform the subscriber that subscriber information has been provided and, in some cases, may be prohibited by law from giving such notice. Finally, the Company may disclose subscriber information or information transmitted over its network where necessary to protect the Company and others from harm, or where such disclosure is necessary to the proper operation of the system.

The Company expects that its Customer who provide Internet services to others will comply fully with all applicable laws concerning the privacy of on-line communications. Customer's failure to comply with those laws will violate the Company policy. Finally, the Company wishes to emphasise that in signing the service agreement, the Customer indemnify the Company for any violation of the service agreement, law, or Company policy that results in loss to the Company or the bringing of any claim against the Company by any third-party. This means that if the Company is sued because of a subscriber's or customer of a subscriber's activity, the subscriber will pay any damages awarded against the Company, plus costs and reasonable attorneys' fees.

We hope this Policy is helpful in clarifying the obligations of Internet users, including the Company and its Customer, as responsible members of the Internet. Any complaints about a subscriber's violation of this AUP should be sent to [info@four.co.uk](mailto:info@four.co.uk)