



COOKIE POLICY

In our website and in our emails, we and third parties may collect certain information by automated means such as cookies and mobile device functionality. This information may include unique browser identifiers, IP address, browser and operating system information, device identifiers, geolocation, other device information, Internet connection information, as well as details about individuals' interactions with our apps, websites and emails (for example, the URL of the third-party website from which you came, the pages on our website that you visit, and the links you click on in our websites). We and third parties may use automated means to read or write information on users' devices, such as in various types of cookies and other browser-based or plugin-based local storage. Cookies and local storage are files that contain data, such as unique identifiers, that we or a third party may transfer to or read from a user's device for the purposes described in here and in our [Privacy Policy](#), such as recognizing the device, service provision, record-keeping, analytics and marketing, depending on the context of collection.

You may be able to set your web browser to refuse certain types of cookies, or to alert you when certain types of cookies are being sent. However, if you block or otherwise reject our cookies, local storage, or other technologies, certain websites (including our own website) may not function properly. These technologies help us (a) keep track of whether you are signed in or have previously signed in so that we can display all the features that are available to you; (b) remember your settings on the pages you visit, so that we can display your preferred content the next time you visit; (c) display personalized content; (d) perform analytics, and measure traffic and usage trends, and better understand the demographics of our users; (e) diagnose and fix technology problems; and (f) otherwise plan for and enhance our business. Also, in some cases, we facilitate the collection of information by advertising services administered by third parties. The ad services may track users' online activities over time by collecting information through automated means such as cookies, and they may use this information to show users ads that are tailored to their individual interests or characteristics and/or based on prior visits to certain sites or apps, or other information we or they know, infer or have collected from the users.

For example, we and these providers may use different types of cookies, other automated technology, and data (i) to recognize users and their devices, (ii) to inform, optimize, and serve ads and (iii) to report on our ad impressions, other uses of ad services, and interactions with these ad impressions and ad services (including how they are related to visits to specific sites or apps). To learn more about interest-based advertising generally, including how to opt out from the targeting of interest-based ads by some of our current ad service partners, visit aboutads.info/choices or youonlinechoices.eu from each of your browsers. You can opt out of Google Analytics and customize the Google Display Network ads by visiting the [Google Ads Settings page](#). Google also allows you to install a [Google Analytics Opt-out Browser Add-on](#) for your browser. If you replace, change or upgrade your browser, or delete your cookies, you may need to use these opt-out tools again. We do not respond to browser-based do-not-track signals. Please visit your mobile device manufacturer's website (or the website for its operating system) for instructions on any additional privacy controls in your mobile operating system, such as privacy settings for device identifiers and geolocation.

COOKIE SHEET

The following cookie sheet lists the cookies and tracking technologies used by Swell. Although we may update this list periodically, please be advised that the names of cookies and tracking technologies are subject to change.

Vendor name	Category	Description	Data tracked
AdRoll Roundtrip	Advertising	Cross platform remarketing tool.	Anonymous (Ad Views, Analytics, Browser Information, Cookie Data, Date/Time, Demographic Data, Interaction Data, Page Views) Pseudonymous (IP Address) PII (Name, Email Address, PII Collected via 3rd Parties, IP Address, Unique Device ID)
Autopilot	CRM	Marketing automation / CRM tool.	Anonymous (Browser Information, Cookie Data, Date/Time, Demographic Data, Internet Service Provider, Interaction Data, Page Views) Pseudonymous (IP Address) PII (Name, Address, Phone Number, Email Address)
Bing Ads (Microsoft)	Advertising	Microsoft Advertising is the online advertising division of Microsoft Corporation. They offer a variety of advertising products in search and display through their various entities.	Anonymous (Ad Views, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data, Page Views, Serving Domains), Pseudonymous (IP Address), Search History, Location Based Data, Clickstream Data), PII (Name, Address, Phone Number, Email Address, Login, IP Address, Unique Device ID)
Criteo	Advertising	Criteo is an advertising network that specializes in retargeting.	Anonymous (Ad Views, Analytics, Browser Information, Cookie Data, Hardware/Software Type, Interaction Data, Page Views) Pseudonymous (IP Address, Search History, Location Based Data, Device ID) PII (Email Address, IP Address)
DoubleClick (Google)	Advertising	DoubleClick digital advertising platform: the ad technology foundation to create, transact, and manage digital advertising for the worlds buyers, creators, and sellers. The DoubleClick platform includes the DoubleClick Advertising Exchange and Double Click Bid Manager.	Anonymous (Ad Views, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data , Page Views, Serving Domains), Pseudonymous (IP Address), Search History, Location Based Data, Clickstream Data), PII (Name, Address, Phone Number, Email Address, Login, IP Address, Unique Device ID)
DoubleClick Spotlight	Advertising	DoubleClick digital advertising platform: the ad technology foundation to create, transact, and manage digital advertising for the worlds buyers, creators, and sellers. The DoubleClick platform includes the DoubleClick Advertising Exchange and Double Click Bid Manager.	Anonymous (Ad Views, Browser Information, Cookie Data , Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data, Page Views, Serving Domains), Pseudonymous (IP Address, Search History, Location Based Data, Clickstream Data), PII (Name, Address, Phone Number, Email Address, Login, IP Address, Unique Device ID)
Facebook connect	Social Media	Facebook Connect is a single sign-on application which allows users to interact on other websites through their Facebook account.	Anonymous (Ad Views, Analytics, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data, Page Views, Serving Domains, Details Undisclosed) Pseudonymous (IP Address, Location Based Data, Clickstream Data, Device ID) PII (Name , Address, Phone Number, Email Address, Login, IP Address, Unique Device ID) Sensitive (Financial Information)
Google Adwords Conversion	Advertising	Google search advertising platform.	Anonymous (Ad Views, Analytics, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data, Page Views, Serving Domains) Pseudonymous (IP Address, Search History, Location Based Data, Device ID) PII (Name , Address, Phone Number, Email Address, Login, IP Address, Unique Device ID)
Google Dynamic Remarketing	Advertising	Google shows ads to users who have visited your site before.	Anonymous (Ad Views, Analytics, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data, Page Views, Serving Domains) Pseudonymous (IP Address, Search History, Location Based Data, Device ID) PII (Name, Address, Phone Number, Email Address, Login, IP Address, Unique Device ID)
Google Tag Manager	Essential	Allows non-developers to deploy tracking scripts through a single script on your website.	Anonymous (Ad Views, Analytics, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data, Page Views, Serving Domains) Pseudonymous (IP Address, Search History, Location Based Data, Device ID) PII (Name, Address, Phone Number, Email Address, Login, IP Address, Unique Device ID)
LinkedIn Marketing Solutions	Advertising	LinkedIn advertising tracker.	Anonymous (Ad Views, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data , Page Views, Serving Domains) Pseudonymous (IP Address, Search History, Location Based Data, Clickstream Data) PII (Name, Address, Phone Number, Email Address, Login, IP Address, Unique Device ID)
New Relic	Site Analytics	New Relic is the web application performance tool for monitoring performance from the end user experience, through servers, and down to the line of application code.	Anonymous (Analytics, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/Software Type, Interaction Data, Page Views, Serving Domains) Pseudonymous (IP Address) PII (Name, Address, Phone Number, Email Address, PII Collected via 3rd Parties, Login, IP Address) Sensitive (Financial Information) Client
Segment	Site Analytics	Segment.io is an analytics service for web applications.	All of the above.
Twitter Advertising	Advertising	Twitter advertising tracker.	Anonymous (Analytics, Browser Information, Cookie Data, Date/Time, Demographic Data, Hardware/Software Type, Internet Service Provider, Interaction Data, Page Views)

From time to time, it may be necessary for us to change this Cookie Policy and the Cookie Sheet. Please check here periodically for any changes.

Effective: May 2018