



Global Cookies and Similar Technologies Tracking

Standard Operating Procedures V2.0

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Contents

Version History	2
Scope.....	2
Roles and Responsibilities	2
Standards	2
I. Categorisation	2
II. Consent.....	3
III. Cookie Banner	4
IV. Expiry	6
V. “Selling” or “Sharing” Personal Information	6
VI. GPC (Global Privacy Control).....	7
VII. Common Practices which must be avoided	7
Appendix	8
A. An example cookie banner for Opt-Out Setups (main banner)	8
B. An example cookie banner for Opt-Out Setups (second screen - overview)	9
C. An example cookie banner for Opt-Out Setups (second screen - vendor categories).....	10
D. An example cookie banner for Opt-Out Setups (second screen - vendors per category)	11
E. An example cookie banner for Opt-Out Setups (second screen – cookie details).....	12
F. An example cookie banner for Opt-In Setups (main banner)	13
G. An example cookie banner for Opt-In Setups (second screen - overview).....	14
H. An example cookie banner for Opt-In Setups (second screen - vendor categories).....	15
I. An example cookie banner for Opt-In Setups (second screen - vendors per category)	16
J. An example cookie banner for Opt-In Setups (second screen – cookie details).....	17
K. Floating Cookie Consent Management Button	18
L. “Do Not Sell My Personal Information” Link	19



Version History

Version	Purpose	Author	Date
1.0	Inception	Thomas Gerauch	01/05/2023
1.0	Publication – Following approval by Richard Pooley	Thomas Gerauch	01/07/2023
2.0	Annual Review no changes needed	Thomas Gerauch	22/02/2024

Scope

These Standards apply to the use of cookies and/or similar tracking technologies on any website, portal, application or other similar technology (referred to in these Standards as a **Website/App**). Where Fiserv operates a website or application on behalf of a client, these Standards should be used as a guide, but the compliance requirements should be validated with the client, and confirmed with the Global Privacy Office and Privacy Legal team as required.

In these Standards, references to **Cookies** means all cookies and other similar technologies used for the identification and tracking of users and/or their devices, including pixel trackers, software development kits (SDKs), 'like buttons', JavaScript, advertising identifiers (such as Android ID), local storage objects, social sharing tools, access to terminal information from APIs, access to GPS, identifiers generated by software or operating system and device/web fingerprinting technologies. These technologies can be stored on or read from devices.

Roles and Responsibilities

These Standards are mandatory for all associates and non-employee workers involved in any aspect of the design, implementation, launch or maintenance of any Website/App.

Standards

I. Categorisation

All Cookies proposed to be used on a Website/App must be designated into one of the five following categories: Essential, Functional, Analytics & Performance, Social Media, Advertising.

These categorisations have to be verified by the Global Privacy team.

Please note: The categories "Functional", "Analytics & Performance", "Social Media" and "Advertising" fall under the umbrella term of "Non-Essential"

- **Essential** (sometimes called **Strictly Necessary** or **Technical Needed**):
These Cookies are absolutely necessary to run the core functionality of the Website/App, in order to provide the service requested by the user and include:
 - session management such as managing shopping carts or holding a login session for the user
 - ensuring that the content of a page loads quickly and effectively by distributing the workload across numerous computers (this is often referred to as 'load balancing' or 'reverse proxying')



- storage of the user's cookies preferences
- cookies that are essential for security purposes (e.g. in connection with online banking services).
- Functional
These Cookies are used for providing additional functionality to the Website/App, including:
 - Preferences set by the user (e.g. language)
 - Embedding videos from video content providers
 - Providing support chats for users
- Analytics and Performance
These Cookies are used for analysing the interactions of users on the Website/App. They are commonly used for identifying how long a user stays on a webpage or where users have come from (e.g. other websites, search engines, etc.). They commonly include:
 - Google Analytics
 - Heap Analytics
 - Adobe Experience Cloud
- Social Media
These Cookies are used by Social Media companies for sharing and/or liking content, such as:
 - LinkedIn
 - The Facebook "Like" button
- Advertising
These Cookies are used for placing (targeted) advertising and for analysing the success of such an advert. Common examples include:
 - Google Ads
 - Amazon Ads.

The categorisation of Cookies must be consistent across all Websites/Apps owned and/or operated by Fiserv, any uncertainties need to be confirmed with the Global Privacy Office.

To ensure consistency across all Websites/Apps, categorisation of Cookies needs to be reviewed by the Global Privacy Office.

II. Consent

If a Cookie is categorised as "Essential", no consent is required for the Cookie to be stored on or read from the user's device. If a Cookie falls under any of the other categories (non-essential), the following rules apply:

- If the website/app targets US markets, no separate consent is required. However at any time the user must be able to disagree to the processing of data (**Opt-Out**) collected via cookies from third parties.
- For all other jurisdictions, the users consent must be obtained prior the deployment of any non-essential cookie (**Opt-In**). For user consent to be valid, it must comply with the following requirements.
 - Prior: Cookie can only be deployed after consent has been given.



- Voluntary: The user must consent voluntarily and without being pressured. The refusal must be as easy as obtaining consent.
- Revocability: Users must be able to withdraw their consent at any time as easily as they gave it.
- Informed: Users must be given information regarding the Cookies which they are being asked to consent to.
- Active consent: Consent must be actively given by the user.
 - An implied consent i.e. “if you continue to use our site, you agree to the use of cookies” is not valid.
- Separate: The consent needs to be separate to the terms and conditions.
- If a sites purpose is to address multiple markets, all relevant requirements have to be implemented, depending on the location of the user who is using the services offered by the website/app.

Example: If a site is addressing merchants in multiple different jurisdictions (i.e. United States and European Union) the banner needs to be set up so that for US visitors an Opt-Out approach is displayed and for EU visitors an Opt-In banner is displayed

III. Cookie Banner

In order to fulfil requirements for Opt-In and Opt-Out regulations, all Websites/Apps must have a (so called) Cookie Banner, which is an overlay which pops up on the relevant Website/App, and must include the following items:

- A. The current Cookie Banner wording drafted by the Privacy Legal Team.
Changes to the wording needs to be agreed and approved by the Privacy Legal Team. The following items must be included in the wording
 1. an explanation that consent can be withdrawn at any time (just for Opt-In solutions)
 2. a high-level description of the Cookies used by the Website/App and the purposes for which they are used
 3. a link to the full Privacy Notice agreed by Privacy and Privacy Legal
 4. a link to the full Cookie Notice agreed by Privacy and Privacy Legal
- B. A button to confirm the information in the banner was provided (just for Opt-Out solutions) – please see [An example cookie banner for Opt-Out Setups \(main banner\)](#).
- C. A button to consent to the use of non-Essential Cookies (just for Opt-In solutions) – please see [An example cookie banner for Opt-In Setups \(main banner\)](#).
- D. A button to decline the use of non-Essential Cookies (just for Opt-In solutions) – please see [An example cookie banner for Opt-In Setups \(main banner\)](#).
- E. A button to manage the use of Cookies individually – please see [An example cookie banner for Opt-Out Setups \(main banner\)](#) or [An example cookie banner for Opt-In Setups \(main banner\)](#).
- F. A button to withdraw consent after it was given (just for Opt-In solutions).
- G. A button to opt out to the use of non-essential cookies (just for Opt-Out solutions) - [An example cookie banner for Opt-Out Setups \(second screen - overview\)](#).



- H. A link to where the user can obtain further information about the use of each Cookie, including information such as (see [An example cookie banner for Opt-Out Setups \(second screen – cookie details\)](#)):
1. a description of the Cookie, including its purpose.
 2. the owner of the Cookie, which may be Fiserv or a third party (e.g. Google)
 3. contact details for the owner of the Cookie, commonly in the form of an email address or a link to the owner’s website
 4. where available details of the locations in which data is processed, and whether it is transferred to third parties

The following table is an overview on when and at which stage above mentioned items are required

Item	Opt-In main window	Opt-In second screen	Opt-Out main window	Opt-Out second screen
A	yes	yes	yes	yes
A.1	yes	yes		
A.2		yes		
A.3	yes	yes	yes	yes
A.4	yes	yes	yes	yes
B			yes	
C	yes	yes		
D	yes	yes		
E	yes		yes	
F		yes		
G				yes
H		yes		yes

The Cookie Banner must be displayed in a prominent position.

The Cookie Banner must be presented to the user on every visit to (or use of) the Website/App unless the user confirmed the information (for Opt-Out solutions) or has made a choice (for Opt-In solutions), irrespective of whether they land on the main page or a subpage.

Note: The banner should not re-appear within 6 months once the user has made their selection

For Opt-In solutions, an exception in the implementation must be configured for some legal pages. On these special pages, no cookie banner is allowed to be displayed. That in mind, at no time non-essential cookies are allowed to be deployed on these pages. Pages for which such an exception must be set up are:

- Page for displaying the Privacy Notice
- Page for displaying the Cookie Notice
- Page for displaying the Binding Corporate Rules
- Page for displaying the legal imprint (only available for some jurisdictions)



After the user has interacted with the banner, the user must be able to amend their cookie preferences at any time. Therefore, there must be an option for the user to re-access to the Cookie banner easily throughout the whole use of the website/app.

- For Opt-In jurisdictions a floating button has to be displayed in the right bottom corner of the users screen (see [Floating Cookie Consent Management Button](#)).
- For Opt-Out jurisdictions a link in the footer of the website/app has to be implemented. Caption of this link must be “Do Not Sell My Personal Information” (see [“Do Not Sell My Personal Information” Link](#)).

Note: Even without monetary consideration some US regulations might define the use of cookie providers as “selling of data”. See [“Selling” or “Sharing” Personal Information](#)

Any variation to any wording needs explicitly to be agreed with GPO and Privacy Legal.

The user must not be prevented from using the Website/App as a result of their rejection of cookies.

IV. Expiry

All Cookies owned by Fiserv directly must expire after a defined period of time, which must not exceed the period for which the Cookie is necessary to achieve its purpose. The implementation of any cookie with an expiry date more than six months (12 months for Opt-Out jurisdictions) from the date of deployment requires the express written approval of the Global Privacy Office. To apply for such an exception, please contact dpo@fiserv.com.

Cookies for storing the cookie preferences of the user (accept/decline for opt-In regulations, disagree to the use of cookies for opt-Out regulations) are also limited to above mentioned expiry dates. This means that the [Cookie Banner](#) popup must be presented to the user again after this date.

V. “Selling” or “Sharing” Personal Information

Some regulations in the United States characterize the collection of data using cookies to, generally, constitute the collection of “personal information”. These regulations also characterize the “disclosing, disseminating [or] making available” of personal information to a third party for “valuable consideration” or a benefit (not necessarily money) as a “sale” of the personal information.

These regulations define “sharing” as the “disclosing, disseminating [or] making available” of personal information to a third party for cross-context behavioural advertising, whether or not for monetary or other valuable consideration.”

The responsible attorney general has, through public statements and enforcement activity, made it clear that he believes the use of cookies provided by third-party ad networks or to otherwise facilitate the placement of targeted ads are “sales.”



In a recent enforcement action, the attorney general of California also indicated that uses of analytics cookies may be considered to be “sales” where there is not an appropriate service provider relationship in place, (vetted by Privacy Legal or Compliance).

VI. GPC (Global Privacy Control)

The GPC implementation must be configured so that when a user has GPC on their browser, Fiserv is automatically opting that user out of any selling or sharing of data with respect to any cookie or tracking technology we use for that user.

Fiserv’s cookie management tool, Evidon, supports GPC. Therefore it is absolutely mandatory to implement all non-essential services in a way that Fiserv’s cookie management tool can control the use of these services.

Global Privacy Control (GPC) is a browser setting that notifies websites of a user's privacy preferences, such as not to share or sell personal data without their consent, by sending a signal to each website a user visits. When visiting a website that supports GPC, that website will automatically register the browser request to opt-out of the sale of the individual's Personal Information.

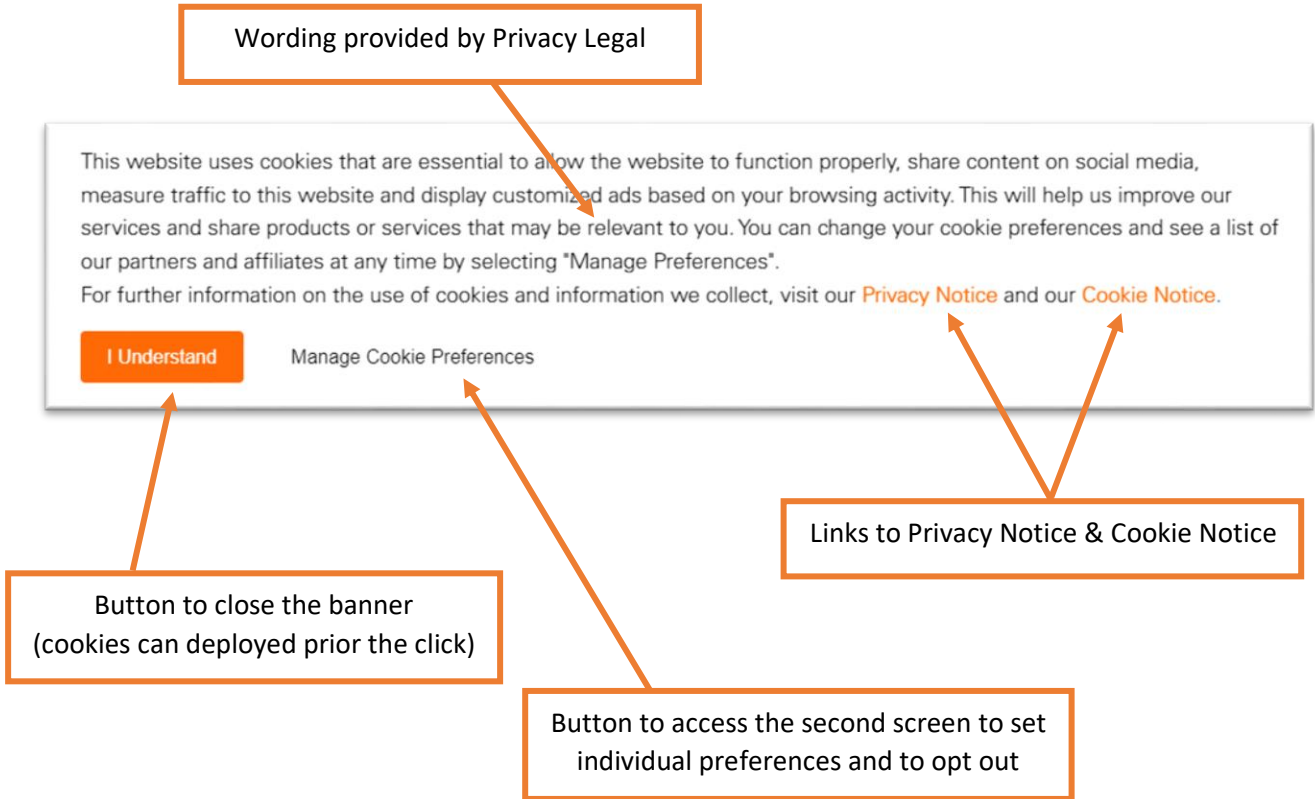
US regulations require that a business that shares or sells Personal Information implement GPC or similar opt out preference signals. Businesses are required to honor signals from consumers which allow consumers to automatically opt-out of sale from their device.

VII. Common Practices which must be avoided

- Use of cookies not categorised as “Essential” or “Strictly Necessary” on the basis of:
 - pre-checked consent boxes
 - the user’s browser settings
- Displaying prominent “accept” buttons for providing consent with hidden or otherwise difficult to identify or find “reject” buttons to opt-out.
- Assuming that consent is granted by the user, for example by displaying a statement that proceeding to use the Website/App implies consent (when consent is required).
- Classifying cookies as “Essential” or “Strictly Necessary” without justification
- Use of “cookie walls” by blocking access to content until a user accepts Cookies

Appendix

A. An example cookie banner for Opt-Out Setups (main banner)



B. An example cookie banner for Opt-Out Setups (second screen - overview)

The screenshot shows a cookie banner with the following content:

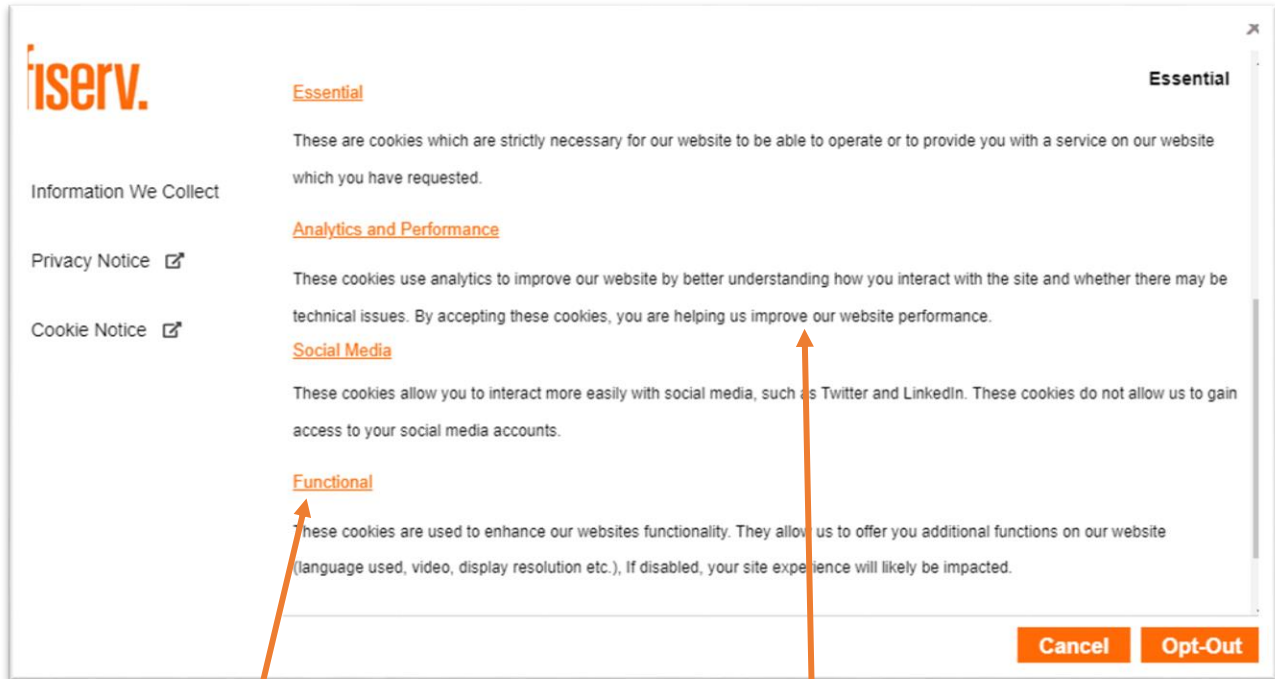
- Header:** "Our use of Cookies"
- Text:** "We use essential cookies to make our website work. We also like to use other cookies, and you can make a choice on whether to allow us to use these."
- Text:** "Below is a list of the different categories of cookies we use on our website. If you click on the category name, you will find a full list of the cookie providers within that category. If you click on the cookie provider's name you will find more information about that cookie including whether it is offered by us or by a cookie provider."
- Text:** "By using the slider button, you can use choose to accept cookies either by category or individually. Cookies are operational when slider is blue. Cookies are not operational when slider is grey."
- Text:** "For further information on the use of cookies and information we collect, visit our [Privacy Notice](#) and our [Cookie Notice](#)."
- Categories:** A list with "Essential" selected.
- Buttons:** "Cancel" and "Opt-Out".
- Left Sidebar:** "Information We Collect", "Privacy Notice", "Cookie Notice".

Callout boxes provide the following annotations:

- Wording provided by Privacy Legal:** Points to the introductory paragraph.
- Links to Privacy Notice & Cookie Notice:** Points to the links in the text.
- Section of services used on the site (see next screenshot):** Points to the "Essential" category.
- Button to close the banner (cookies can be deployed prior the click):** Points to the "Cancel" button.
- Button to opt out of the processing:** Points to the "Opt-Out" button.



C. An example cookie banner for Opt-Out Setups (second screen - vendor categories)

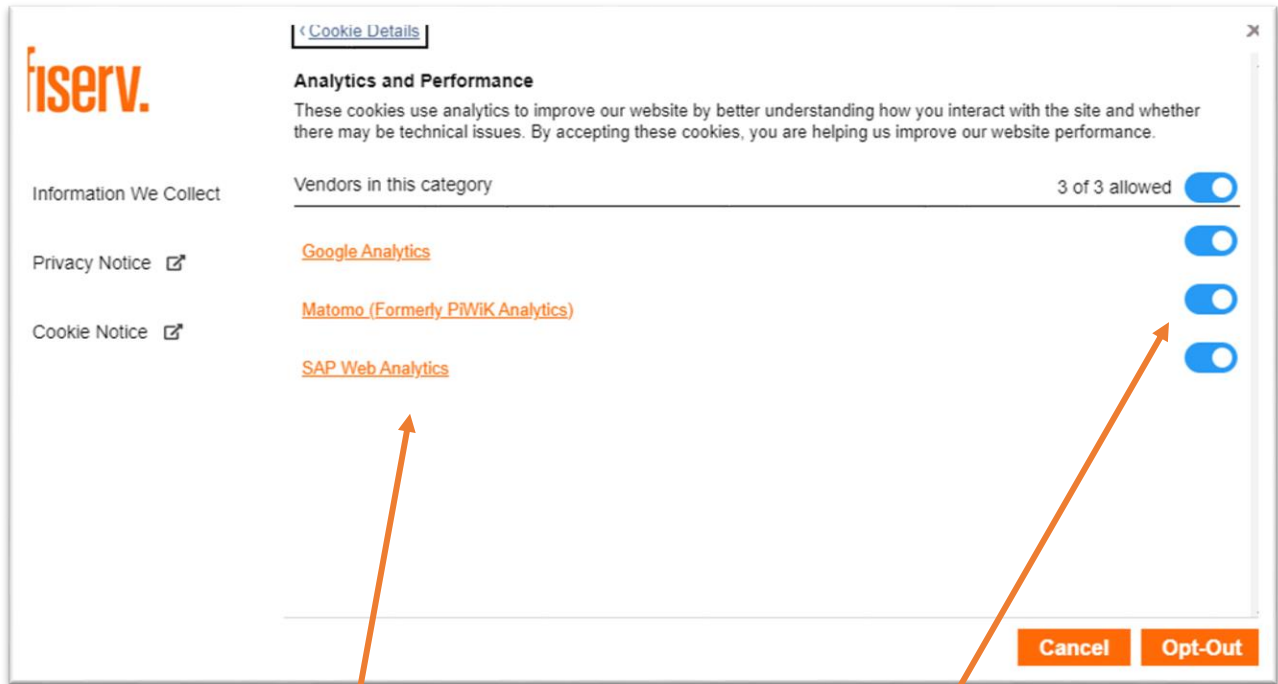


Link to see which services/vendors are used in this category

List of categories of used services (categorization follows GPO guidance)

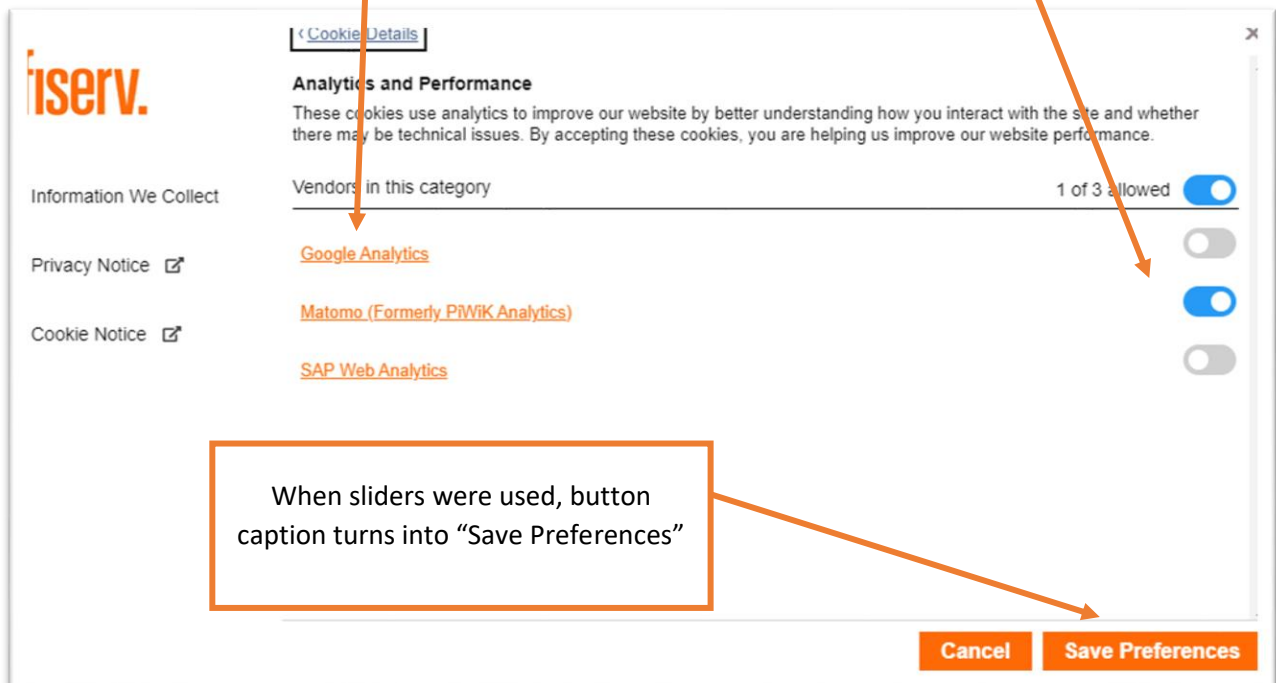


D. An example cookie banner for Opt-Out Setups (second screen - vendors per category)



services/vendors used in this category.
Link points to more details

Slider to turn on/off category or individual services



When sliders were used, button caption turns into "Save Preferences"

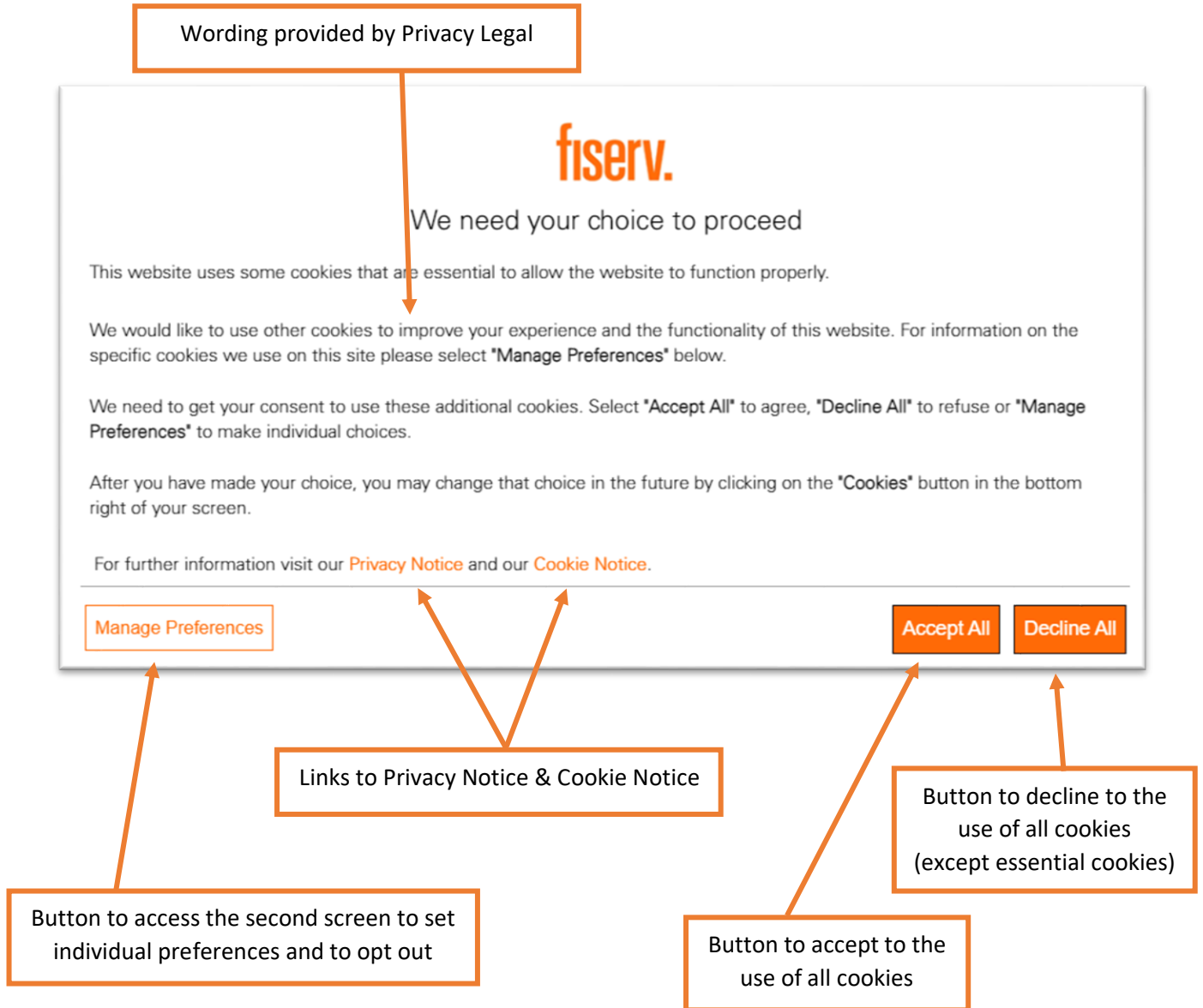
E. An example cookie banner for Opt-Out Setups (second screen – cookie details)

Details about a service.

The screenshot shows a cookie banner interface. At the top left is the 'fiserv.' logo. Below it, on the left side, are links for 'Information We Collect', 'Privacy Notice' (with an external link icon), and 'Cookie Notice' (with an external link icon). The main content area features the 'Google Analytics' logo and the text 'Owned by Google Inc.' and 'Website: <https://marketingplatform.google.com/about/analytics/>'. Below this is a section titled 'In Their Own Words' with a paragraph of text: 'Google Analytics gives you insights into your website traffic and marketing effectiveness. We help you buy the right keywords, target your best markets, and engage and convert more customers.' Underneath is the heading 'What data does this company collect?' followed by 'Data Collected'. At the bottom right, there are two buttons: 'Cancel' and 'Opt-Out'. A blue box with the text 'Details about a service.' is positioned above the banner, with an orange arrow pointing to the website URL.



F. An example cookie banner for Opt-In Setups (main banner)



G. An example cookie banner for Opt-In Setups (second screen - overview)

The screenshot shows a cookie banner with the following elements and callouts:

- Wording provided by Privacy Legal:** Points to the text "Our use of Cookies" and the introductory paragraph.
- Information We Collect:** A section header on the left side.
- Privacy Notice & Cookie Notice:** Two links with external icons on the left side.
- Our use of Cookies:** The main heading and introductory text.
- Below is a list of the different categories of cookies we use on our website...**: A paragraph explaining the list of categories.
- By using the slider button, you can choose to accept cookies either by category or individually. Cookies are operational when slider is blue. Cookies are not operational when slider is grey.**: A paragraph explaining the slider functionality.
- For further information on the use of cookies and information we collect, visit our Privacy Notice and our Cookie Notice.**: A paragraph with links to the Privacy Notice and Cookie Notice.
- Categories:** A section header for the list of cookie categories.
- Essential:** A category name, with "Essential" also appearing in a smaller font at the bottom right of the banner.
- Decline All:** A button to decline the use of all cookies (except essential cookies).
- Accept All:** A button to accept the use of all cookies.

Callout boxes provide additional context:

- Links to Privacy Notice & Cookie Notice:** Points to the two links on the left.
- Section of services used on the site (see next screenshot):** Points to the "Essential" category name.
- Button to decline to the use of all cookies (except essential cookies):** Points to the "Decline All" button.
- Button to accept to the use of all cookies:** Points to the "Accept All" button.



H. An example cookie banner for Opt-In Setups (second screen - vendor categories)

fiserv. Essential

Information We Collect

Privacy Notice [↗](#)

Cookie Notice [↗](#)

Essential

These are cookies which are strictly necessary for our website to be able to operate or to provide you with a service on our website which you have requested.

Social Media

These cookies allow you to interact more easily with social media, such as Twitter and LinkedIn. These cookies do not allow us to gain access to your social media accounts.

Analytics and Performance

These cookies use analytics to improve our website by better understanding how you interact with the site and whether there may be technical issues. By accepting these cookies, you are helping us improve our website performance.

Functional

These cookies are used to enhance our websites functionality. They allow us to offer you additional functions on our website (language used, video, display resolution etc.). If disabled, your site experience will likely be impacted.

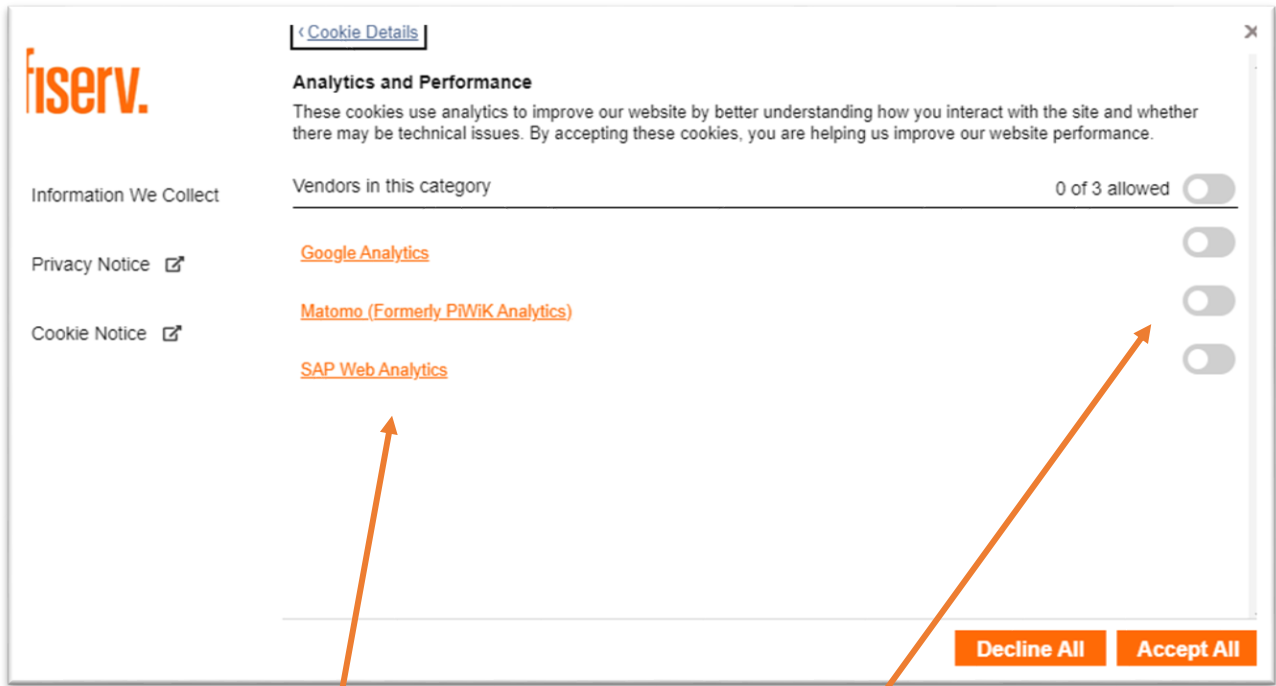
Decline All **Accept All**

Link to see which services/vendors are used in this category

List of categories of used services (categorization follows GPO guidance)

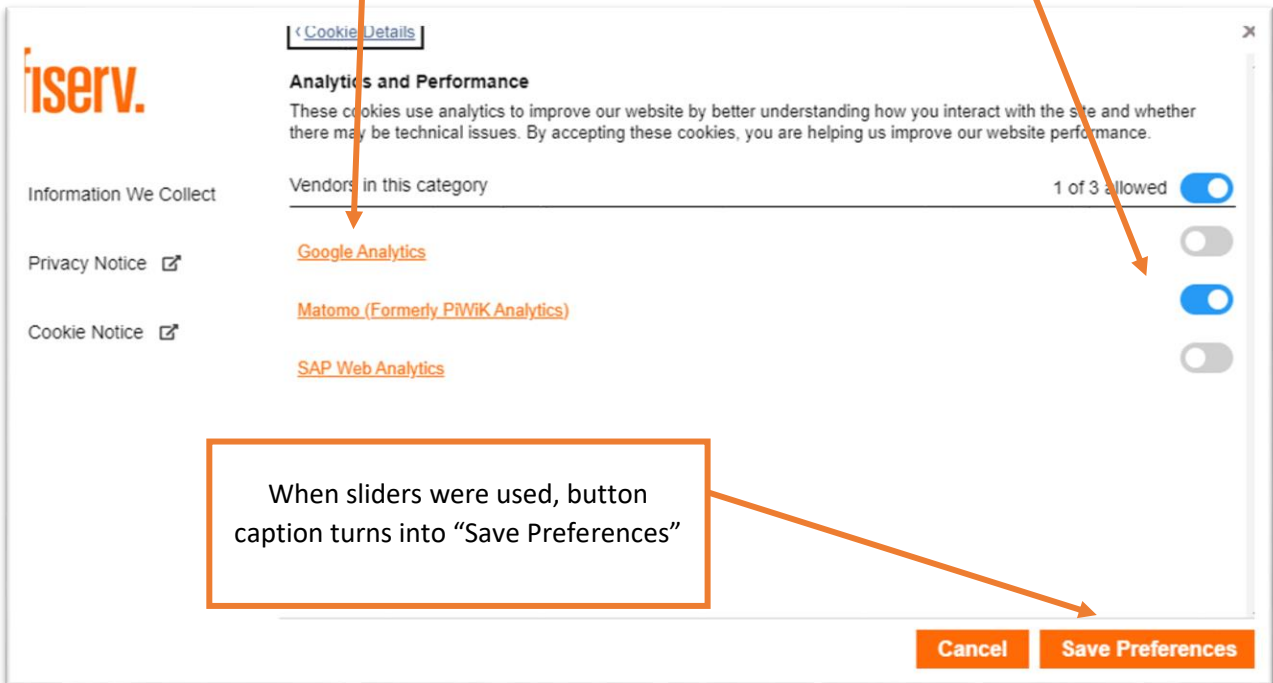


I. An example cookie banner for Opt-In Setups (second screen - vendors per category)



services/vendors used in this category.
Link points to more details

Slider to turn on/off category or individual services



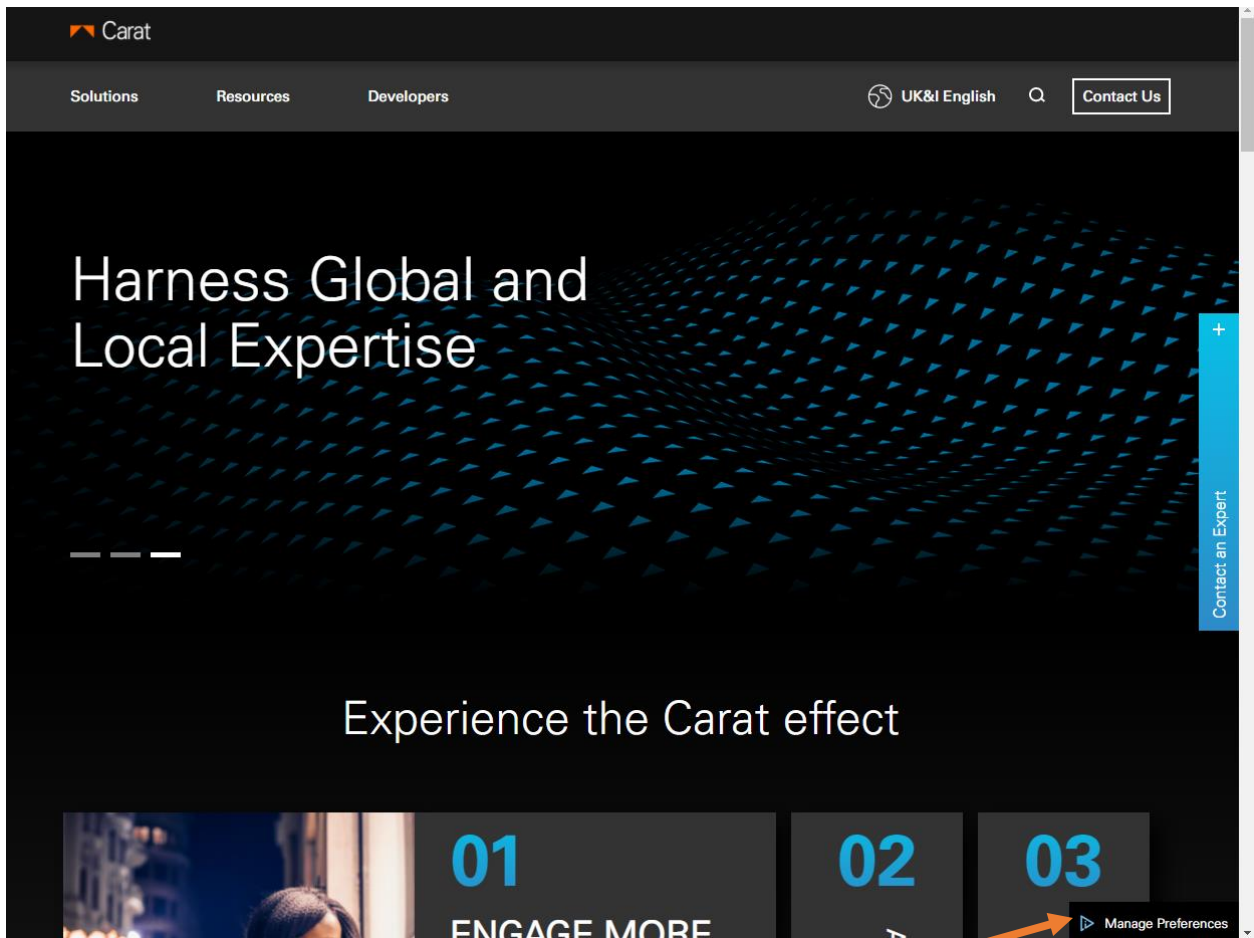
When sliders were used, button caption turns into "Save Preferences"

J. An example cookie banner for Opt-In Setups (second screen – cookie details)

Details about a service.

The screenshot shows a cookie banner for Google Analytics. On the left, there is a sidebar with the Fiserv logo and links for 'Information We Collect', 'Privacy Notice', and 'Cookie Notice'. The main content area features the Google Analytics logo and the text 'Owned by Google Inc.' and 'Website: <https://marketingplatform.google.com/about/analytics/>'. Below this is a section titled 'In Their Own Words' with a paragraph of text. At the bottom right, there are two buttons: 'Decline All' and 'Accept All'. An orange box at the top of the page contains the text 'Details about a service.', with an arrow pointing to the website URL in the banner.

K. Floating Cookie Consent Management Button

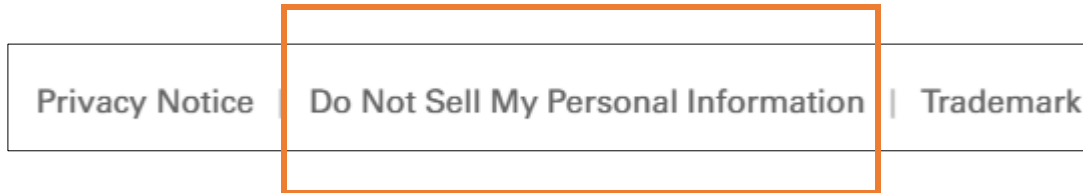


A floating Cookie Consent button must be visible on the bottom right-hand side of the users screen at all times.

Caption varies on the jurisdiction



L. "Do Not Sell My Personal Information" Link



"Do not Sell" link in the footer of the page