

COOKIE POLICY

ABOUT THIS COOKIE POLICY

This Cookie Policy explains how Bidwells LLP (“we”, “us”, “our”) uses cookies and similar technologies when you visit Bidwells or Bidwells Investment Management (the “Website”). It explains what these technologies are, why we use them, and the choices you have to control them.

Cookies are small text files placed on your device, such as your computer, smartphone or tablet, when you use a website. Similar technologies include tools that store or access information on your device, for example local storage, pixels, tags, scripts, software development kits and device identifiers.

WHY WE USE COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar technologies to:

- make the Website work, for example by enabling core features, security, fraud prevention, load balancing and technical fault detection;
- remember your choices and preferences, where you choose to save them;
- understand how the Website is used so that we can maintain, measure and improve it;
- support marketing, advertising and campaign measurement, where permitted by law and your choices.

Under UK privacy rules, including the Privacy and Electronic Communications Regulations 2003 (PECR) as amended by the Data (Use and Access) Act 2025 (DUAA), we must provide clear and comprehensive information about cookies and similar technologies. We must obtain consent before placing or reading cookies or similar technologies unless an exception applies, such as where the technology is strictly necessary for a service you have requested or falls within a specific low-risk DUAA exception.

STRICTLY NECESSARY COOKIES

Strictly necessary cookies are essential to enable the Website to function and to provide the service you request. These cookies do not require your consent. Examples may include cookies or similar technologies that are necessary for security, fraud prevention, detecting technical faults, load balancing, automatic authentication, remembering information you enter into a form, remembering items in a basket, or remembering your cookie choices.

We do not use “strictly necessary” as a catch-all category. Cookies used for advertising, behavioural tracking, cross-site profiling or non-essential personalisation are not strictly necessary and are only used where permitted by law and your choices.

NON-ESSENTIAL COOKIES AND DUAA EXCEPTIONS

Where cookies or similar technologies are not strictly necessary, we will either ask for your consent or, where the law allows, rely on a specific DUAA exception. Where an exception is used, we will provide clear information and a simple way to object free of charge, where required.

Cookie / technology type	How we use it and your choices
Analytics / statistical cookies	May be used without consent only where their sole purpose is to collect statistical information about how the Website or service is used, with a view to making improvements, and where information is not shared except to support those improvements. A simple free opt-out must be available. If used for advertising, profiling, behavioural tracking or wider sharing, consent is required.
Appearance / functionality preferences	May be used without consent only where their sole purpose is to adapt the way the Website appears or functions to your preferences, or to enhance appearance or functionality. A simple free opt-out must be available.
Emergency assistance	May be used without consent where necessary to provide or support emergency assistance. Bidwells does not expect this to be a routine use on its Website.
Marketing, advertising and tracking cookies	Used to support advertising, measure campaigns, track visitors across websites or build profiles. These require consent before they are used.

YOUR CHOICES

You can choose to:

- accept all optional cookies;
- reject all optional cookies;
- customise your choices by category;
- object to cookies used under a DUAA exception, where an objection mechanism is provided.

We design our cookie banner and cookie settings tool so that it is as easy to reject optional cookies as it is to accept them. We do not set optional cookies before you have had the opportunity to make a choice, unless a legal exception applies.

HOW TO CHANGE, WITHDRAW CONSENT OR OBJECT

You can change your cookie choices at any time by clicking the Cookie cog icon in the bottom left corner of our website(s).

Withdrawing consent will not affect the lawfulness of any processing carried out before you withdrew it, but it will stop cookies in that category from being used going forward, subject to strictly necessary cookies and any cookie use that falls within a lawful exception.

You can also manage cookies through your browser settings, for example by blocking or deleting cookies. If you block all cookies, some parts of the Website may not function properly, particularly strictly necessary features.

COOKIES WE USE (COOKIE REGISTER)

Our Cookie Register is a list of the cookies and similar technologies used on this Website. This list is reviewed and updated every three months, and whenever we change the technologies on our Website. Some cookies are set by third parties who provide services on our Website. The Cookie Register can be found in Appendix 1.

Governance note: The classification and control approach in the Cookie Register should be checked against the live cookie management platform before publication. Where a cookie does not meet the exact conditions for a DUAA exception, it should be treated as consent-based unless another exception applies.

THIRD-PARTY COOKIES AND SHARING

Some cookies may be placed by third-party services that appear on our pages, for example embedded video, maps, analytics or advertising technology. Third parties may use cookies or similar technologies in accordance with their own privacy and cookie policies. We provide information about these cookies in the Cookie Register and in our cookie settings tool.

MORE INFORMATION (PRIVACY AND CONTACT)

For more information about how we use personal data, please see our Privacy Notice:
<https://www.bidwells.co.uk/policies-statements/privacy-policy/>

Bidwells has appointed WorkNest as its Data Protection Officer. If you have any questions about this Cookie Policy or use of Cookies, or have privacy-related queries may be directed to gdprinfo@bidwells.co.uk.

UPDATES TO THIS COOKIE POLICY

We may update this Cookie Policy from time to time to reflect changes in the cookies we use or for other operational, legal or regulatory reasons.

APPENDIX 1: COOKIE REGISTER

The Cookie Register has been refreshed to add a “Control approach / note” column and to flag cookies that may be consent-based or require assessment against the DUAA statistical or appearance/functionality exceptions. The original register content should be checked against the live cookie management platform before publication.

Strictly Necessary

These cookies are required for the operation, security or technical delivery of the Website. Essential cookies are always enabled because the Website may not work properly without them.

Cookie ID	First/Third Party Provider	Domain	Duration	Purpose/Description	Control approach / note
ARRAffinity	First (Microsoft Azure)	.homes.bidwells.co.uk	Session	Ensures requests from a user are routed to the same server (load balancing).	Strictly necessary.
ARRAffinitySameSite	First (Microsoft Azure)	.homes.bidwells.co.uk	Session	Same as ARRAffinity, with SameSite attribute for security.	Strictly necessary.
__cf_bm	Third (Cloudflare)	.hubspot.com	30 minutes	Bot protection.	Strictly necessary where used for security or bot protection.
_cfuvid	Third (Cloudflare/Vimeo)	.hubspot.com / .vimeo.com	Session	Distinguishes users for security.	Strictly necessary where used for security.

Analytical or Performance

These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

Cookie ID	First/Third Party Provider	Domain	Duration	Purpose/Description	Control approach / note
ai_session	First (Microsoft Application Insights)	homes.bidwells.co.uk	30 minutes	Identifies unique sessions for performance monitoring.	Assess against DUAA statistical / service improvement exception; otherwise consent.
__hstc	First (HubSpot)	.bidwells.co.uk	6 months	Tracks visitors.	Likely consent unless configured solely for statistical improvement with opt-out.
hubspotutk	First (HubSpot)	.bidwells.co.uk	6 months	Tracks identity.	Likely consent unless strictly limited and not used for profiling or marketing.
__hssrc	First (HubSpot)	.bidwells.co.uk	Session	Browser restart detection.	Consent or DUAA statistical exception if conditions met.
__hssc	First (HubSpot)	.bidwells.co.uk	30 minutes	Session tracking.	Consent or DUAA statistical exception if conditions met.
vuid	First (Vimeo)	homes.bidwells.co.uk	1 year	Video analytics ID.	Likely consent, particularly where third-party analytics applies.
vtsrc	First	homes.bidwells.co.uk	2 months	Tracks behaviour.	Consent unless solely statistical with opt-out.
zaius_js_version	First	homes.bidwells.co.uk	1 year	Script version tracking.	Assess purpose; consent if not strictly necessary or DUAA exempt.
z_idsyncs	First	homes.bidwells.co.uk	1 year	ID syncing.	Likely consent.
is	First	.bidwells.co.uk	30 minutes	Session analytics.	Consent or DUAA statistical exception if conditions met.
iv	First	.bidwells.co.uk	1 year	Interaction tracking.	Consent unless solely statistical with opt-out.

Functionality

These are used to recognise you when you return to our website. This enables us to personalise our content for you and remember your preferences (for example, your choice of language or region).

Cookie ID	First/Third Party Provider	Domain	Duration	Purpose/Description	Control approach / note
Player	Third (Vimeo)	Vimeo domains	1 minute	Video preferences.	Consent or DUAA appearance/functionality exception if conditions met.

lang	Third (LinkedIn)	.linkedin.com	Session	Language preference.	Consent or DUAA appearance/functionality exception if conditions met.
messagesUtk	First (HubSpot)	.bidwells.co.uk	6 months	Chat recognition.	Likely consent unless essential to a requested chat function and configured accordingly.
_hs_opt_out	First (HubSpot)	.bidwells.co.uk	13 months	Consent preference.	Strictly necessary to record cookie preferences.
hs_langswitcher_choice	First (HubSpot)	.bidwells.co.uk	2 years	Language selection.	DUAA appearance/functionality exception may apply with opt-out, depending on configuration.

Marketing

These cookies track visitors across websites to display relevant and engaging advertisements.

Cookie ID	First/Third Party Provider	Domain	Duration	Purpose/Description	Control approach / note
bcookie	Third (LinkedIn)	.linkedin.com	1 year	Ad tracking.	Consent required.
bscookie	Third (LinkedIn)	.linkedin.com	1 year	Ad tracking.	Consent required.
li_gc	Third (LinkedIn)	.linkedin.com	6 months	Consent storage.	Consent preference cookie; check configuration.
lidc	Third (LinkedIn)	.linkedin.com	24 hours	Ad delivery.	Consent required unless strictly necessary for a requested feature, which is unlikely.
UserMatchHistory	Third (LinkedIn)	.linkedin.com	30 days	Ad targeting.	Consent required.
AnalyticsSyncHistory	Third (LinkedIn)	.linkedin.com	30 days	Ad sync.	Consent required.
li_sugr	Third (LinkedIn)	.linkedin.com	3 months	Identity matching.	Consent required.
_fbp	First (Meta)	.bidwells.co.uk	3 months	Ad tracking.	Consent required.
_fbclid	First (Meta)	.bidwells.co.uk	2 years	Conversion tracking.	Consent required.
fr	Third (Meta)	.facebook.com	90 days	Ad targeting.	Consent required.

VERSION CONTROL

Current Date: 24th July 2026

Next review date: 24th July 2027

Doc Ref/Version: 1.2 GO_LCP_FW_POL_0023

No	Detail	Date	Approved by
1.0	First Draft – reviewed by Chelsea Jarvis	06/05/2026	AH
1.1	Links updated and BIM Referenced	21/05/2026	AH
1.2	Updated to reflect DUAA amendments to PECR, including new low-risk exceptions, simple objection rights and updated cookie control notes.	24/07/2026	AH