

# Cookies policy

## 1. Introduction

- 1.1 Our website uses cookies.
- 1.2 Insofar as those cookies are not strictly necessary for the provision of [our website and services], we will ask you to consent to our use of cookies when you first visit our website.

## 3. About cookies

- 3.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 3.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 3.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

## 4. Cookies that we use

- 4.1 We use cookies for the following purposes:
  - (a) [**authentication and status** - we use cookies [to identify you when you visit our website and as you navigate our website, and to help us determine if you are logged into our website][ (cookies used for this purpose are: *[identify cookies]*)]]];
  - (b) [**shopping cart** - we use cookies to [maintain the state of your shopping cart as you navigate our website][ (cookies used for this purpose are: *[identify cookies]*)]]];
  - (c) [**personalisation** - we use cookies [to store information about your preferences and to personalise our website for you][ (cookies used for this purpose are: *[identify cookies]*)]]];
  - (d) [**security** - we use cookies [as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally][ (cookies used for this purpose are: *[identify cookies]*)]]];
  - (e) [**advertising** - we use cookies [to help us to display advertisements that will be relevant to you][ (cookies used for this purpose are: *[identify cookies]*)]]];

- (f) [**analysis** - we use cookies [to help us to analyse the use and performance of our website and services][ (cookies used for this purpose are: [*identify cookies*)]]; and
- (g) [**cookie consent** - we use cookies [to store your preferences in relation to the use of cookies more generally][ (cookies used for this purpose are: [*identify cookies*)]].

[additional list items]

## 5. Cookies used by our service providers

- 5.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.
- 5.2 We use Google Analytics, which gathers information about the use of our website and uses cookies for this purpose. We use the information gathered by Google Analytics to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://policies.google.com/technologies/partner-sites> and you can review Google's privacy policy at <https://policies.google.com/privacy>. The cookies used by Google Analytics are named `_ga` and `_ga+container-id`.
- 5.3 We publish Google AdSense advertisements on our website[, together with advertisements from the following advertisers and advertising networks that are distributed by Google: [*identify and provide links to advertisers and networks*]]. The advertisements may be personalised to reflect your interests. To help determine your interests Google and its partners use cookies.[ The relevant cookies used by our website are named [NID and ENID].] The cookies are used to track your visits to our website and your visits to other websites. You can opt out of Google's personalised advertising or customise the advertising that you see by visiting <https://adssettings.google.com/> and <https://myadcenter.google.com>. You can opt out of third party cookie use for personalised advertising by visiting <https://youradchoices.com>. To find out more about Google's use of personal data, you can review Google's privacy policy at <https://policies.google.com/privacy>.
- 5.4 We use a Meta (Facebook) pixel on our website. Using the pixel, Meta collects information about the users and use of our website. The information is used to personalise Meta advertisements and to analyse the use of our website. To find out more about the Meta pixel and about Meta's use of personal data generally, see the Meta cookie policy at <https://www.facebook.com/privacy/policies/cookies/> and the Meta privacy policy at <https://www.facebook.com/privacy/policy>. The Meta cookie policy includes information about controlling Meta's use of cookies to show you advertisements. If you are a registered Facebook user, you can adjust how advertisements are targeted by following the instructions at <https://www.facebook.com/help/568137493302217>.
- 5.5 We use [*identify service provider*] to [*specify service*]. This service uses cookies for [*specify purpose(s)*]. You can view the privacy policy of this service provider at [*URL*].[ The relevant cookies are: [*identify cookies*].]

## 6. Managing cookies

6.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser and from version to version. You can obtain up-to-date information about managing cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
- (b) <https://support.mozilla.org/en-US/products/firefox/privacy-and-security> (Firefox);
- (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
- (d) <https://support.apple.com/en-gb/guide/safari/welcome/mac> (Safari);  
and
- (e) <https://support.microsoft.com/en-gb/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd> (Edge).

*[additional list items]*

6.2 Blocking all cookies will have a negative impact upon the usability of many websites.

6.3 If you block cookies, you will not be able to use all the features on our website.

## 7. Cookie preferences

7.1 You can manage your preferences relating to the use of cookies on our website by visiting: *[URL]*

## 8. Our details

8.1 This website is owned and operated by *[name]*.

8.2 We are registered in *[England and Wales]* under registration number *[number]*, and our registered office is at *[address]*.

8.3 Our principal place of business is at *[address]*.

8.4 You can contact us:

- (a) *[by post, to [the postal address given above]]*;
- (b) *[using our website contact form]*;
- (c) *[by telephone, on [the contact number published on our website]]*; or
- (d) *[by email, using [the email address published on our website]]*.

*[additional list items]*

# Free cookies policy: drafting notes

In an ideal world, cookies policies would be published for the purpose of informing users about how tracking technologies are used on a website.

In the real world, cookies policies have a slightly different primary purpose: legal compliance. UK and EU laws require that, if a website uses cookies or equivalent technologies, the website operator must (unless the "strictly necessary" exception applies) make certain disclosures in relation to the use of the cookies.

This template for the creation of cookies policies has been designed to help website operators comply with the UK and EU disclosure obligations.

This free cookie policy covers the key subject matter in any such policy: explaining what cookies are, describing the purposes for which cookies may be used, and providing information to users about the management of cookies. It also contains optional disclosures relating to Google Analytics and Google AdSense cookies, and Meta pixels.

Website operators may be required, in addition, to seek users' consent to the use of some cookies. The consent obligation sits alongside the information obligation, and compliance with the latter does not entail compliance with the former.

UK law on this subject is contained in Regulation 6 of The Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by The Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011. The General Data Protection Regulation or GDPR will also apply where cookies use involves the processing of personal data.

## Section 1: Introduction

### Section 1.2

The inclusion of this statement in your policy will not in itself satisfy the requirements of the EU's ePrivacy Directive or the UK's Privacy and Electronic Communications (EC Directive) Regulations 2003 as regards consent to the use of cookies.

- *Directive 2002/58/EC (Directive on privacy and electronic communications) - <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32002L0058&from=EN>*
- *Privacy and Electronic Communications (EC Directive) Regulations 2003 (original form) - <http://www.legislation.gov.uk/uksi/2003/2426/made>*
- *Cookies and similar technologies, Guide to PECR, UK Information Commissioner's Office - <https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/>*

## Section 2: Credit

### Section: Free documents licensing warning

Optional element. Although you need to retain the credit, you should remove the inline copyright warning from this document before use.

### **Section 3: About cookies**

Under EU law, there are two additional requirements in relation to the use of cookies and similar technologies, which apply over-and-above the rules regulating the processing of personal data: a consent requirement and an information disclosure requirement. The provisions of this document relating to cookies are designed to aid compliance with the information disclosure requirement.

This requirement derives from Article 5(3) of Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications), which provides that:

"Member States shall ensure that the use of electronic communications networks to store information or to gain access to information stored in the terminal equipment of a subscriber or user is only allowed on condition that the subscriber or user concerned is provided with clear and comprehensive information in accordance with Directive 95/46/EC, inter alia about the purposes of the processing, and is offered the right to refuse such processing by the data controller. This shall not prevent any technical storage or access for the sole purpose of carrying out or facilitating the transmission of a communication over an electronic communications network, or as strictly necessary in order to provide an information society service explicitly requested by the subscriber or user."

The requirement was implemented in the UK in the Privacy and Electronic Communications (EC Directive) Regulations 2003. In its current (amended) form, Regulation 6 states:

"(1) Subject to paragraph (4), a person shall not store or gain access to information stored, in the terminal equipment of a subscriber or user unless the requirements of paragraph (2) are met.

(2) The requirements are that the subscriber or user of that terminal equipment - (a) is provided with clear and comprehensive information about the purposes of the storage of, or access to, that information; and (b) has given his or her consent.

(3) Where an electronic communications network is used by the same person to store or access information in the terminal equipment of a subscriber or user on more than one occasion, it is sufficient for the purposes of this regulation that the requirements of paragraph (2) are met in respect of the initial use.

(3A) For the purposes of paragraph (2), consent may be signified by a subscriber who amends or sets controls on the internet browser which the subscriber uses or by using another application or programme to signify consent.

(4) Paragraph (1) shall not apply to the technical storage of, or access to, information - (a) for the sole purpose of carrying out the transmission of a communication over an electronic communications network; or (b) where such storage or access is strictly necessary for the provision of an information society service requested by the subscriber or user."

In their original form, these Regulations can be found on the [legislation.gov.uk](http://legislation.gov.uk) website.

- *Directive 2002/58/EC (Directive on privacy and electronic communications)* - <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32002L0058&from=EN>
- *Privacy and Electronic Communications (EC Directive) Regulations 2003 (original form)* - <http://www.legislation.gov.uk/uksi/2003/2426/made>

### **Section 3.2**

Optional element.

### **Section 3.3**

Optional element.

### **Section 4: Cookies that we use**

Optional element.

### **Section 5: Cookies used by our service providers**

Does the website serve any third party cookies, analytics cookies or tracking cookies to users?

### **Section 5.2**

Optional element.

### **Section 5.3**

Optional element. Will Google advertisements be published on the website?

Note: Google's has particular privacy notification requirements in relation to the publication of Google advertisements on a website.

- *Required content, AdSense Help, Google, Inc* - <https://support.google.com/adsense/answer/1348695?hl=en-GB>

### **Section 5.4**

Optional element. Will the website use a Meta pixel?

### **Section 5.5**

Optional element.

### **Section 6: Managing cookies**

### **Section 6.3**

Optional element. Will the blocking of cookies have a negative effect upon the use of the website from a user perspective?

## **Section 7: Cookie preferences**

Are there any cookie preference management facilities available to users on the website?

### **Section 7.1**

- Identify the web page users should visit to manage their cookie preferences.

## **Section 8: Our details**

Optional element.

The provisions here reflect a mixture of EU law and UK law requirements relating to contact information.

All services covered by the Ecommerce Directive (which was implemented in the UK through the Electronic Commerce (EC Directive) Regulations 2002) must provide a name, a geographic address (not a P.O. Box number) and an email address.

Under distinct UK legislation, UK companies must provide their corporate names, their registration numbers, their place of registration and their registered office address on their websites (although not necessarily in this document). Sole traders and partnerships that carry on a business in the UK under a "business name" (i.e. a name which is not the name of the trader/names of the partners or certain other specified classes of name) must also make certain additional disclosures: (a) in the case of a sole trader, the individual's name; (b) in the case of a partnership, the name of each member of the partnership; and (c) in either case, in relation to each person named, an address in the UK at which service of any document relating in any way to the business will be effective. All operators covered by the Provision of Services Regulations 2009 must also provide a telephone number.

- *Electronic Commerce (EC Directive) Regulations 2002 (original version)* - <https://www.legislation.gov.uk/ukxi/2002/2013/made>
- *Provision of Services Regulations 2009* - <https://www.legislation.gov.uk/ukxi/2009/2999>
- *Directive 2000/31/EC (Directive on electronic commerce)* - <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32000L0031>

### **Section 8.1**

- What is the name of the company, partnership, individual or other legal person or entity that owns and operates the website?

### **Section 8.2**

Optional element. Is the relevant person a company?

- In what jurisdiction is the company registered?
- What is the company's registration number or equivalent?

- Where is the company's registered address?

### **Section 8.3**

Optional element.

- Where is the relevant person's head office or principal place of business?

### **Section 8.4**

Optional element.

- By what means may the relevant person be contacted?
- Where is the relevant person's postal address published?
- Either specify a telephone number or give details of where the relevant number may be found.
- Either specify an email address or give details of where the relevant email address may be found.