

# 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.

## 2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

*You must retain the above credit. Use of this document without the credit is an infringement of copyright. However, you can purchase from us an equivalent document that does not include the credit.*

## 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 do not typically contain any information that personally identifies a user, but personal information 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 - we use cookies [to identify you when you visit our website and as you navigate our website][ (cookies used for this purpose are: *[identify cookies]*)]]];
  - (b) [status - we use cookies [to help us to determine if you are logged into our website][ (cookies used for this purpose are: *[identify cookies]*)]]];
  - (c) [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]*)]]];

- (d) [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]*)]]];
- (e) [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]*)]]];
- (f) [advertising - we use cookies [to help us to display advertisements that will be relevant to you][ (cookies used for this purpose are: *[identify cookies]*)]]];
- (g) [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
- (h) [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 to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>. [The relevant cookies are: *[identify cookies]*.]
- 5.3 [We publish Google AdSense interest-based advertisements on our website. These are tailored by Google to reflect your interests. To determine your interests, Google will track your behaviour on our website and on other websites across the web using cookies.] OR [We publish Google AdSense advertisements on our website. To determine your interests, Google will track your behaviour on our website and on other websites across the web using cookies. This behaviour tracking allows Google to tailor the advertisements that you see on other websites to reflect your interests (but we do not publish interest-based advertisements on our website).] You can view, delete or add interest categories associated with your browser by visiting: <https://adssettings.google.com>. You can also opt out of the AdSense partner network cookie using those settings or using the Network

Advertising Initiative's multi-cookie opt-out mechanism at:

<http://optout.networkadvertising.org>. However, these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-ins available at: <https://support.google.com/ads/answer/7395996>. [ The relevant cookies are: *[identify cookies]*.]

5.4 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 however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (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 from time to time]]; or
  - (d) [by email, using [the email address published on our website from time to time]].

*[additional list items]*

## **Free cookies policy: drafting notes**

UK and EU law requires that, where a website uses cookies or equivalent technologies, the website operator must make certain disclosures in relation to the use of the cookies.

This policy template has been designed to help website operators comply with this disclosure obligation. Website operators may be required, in addition, to seek users' consent to the use of cookies.

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 privacy policy will not in itself satisfy the requirements of the Privacy and Electronic Communications (EC Directive) Regulations 2003 as regards consent to the use of cookies. Guidance concerning methods of obtaining such consent is included on the Information Commissioner's website (<http://www.ico.gov.uk>).

### **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**

#### **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 AdSense advertisements be published on the website?

This provision should be included if you publish Google AdSense interest-based advertisements on your website. Additional disclosures will be required if you have not opted out of third-party ad serving.

If the website sets any other cookies to users' machines that track behaviour, information about those cookies will also need to be disclosed.

## **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.

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 website disclosures: (i) in the case of a sole trader, the individual's name; (ii) in the case of a partnership, the name of each member of the partnership; and (iii) 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 websites covered by the Electronic Commerce (EC Directive) Regulations 2002 must provide a geographic address (not a PO Box number) and an email address. All website operators covered by the Provision of Services Regulations 2009 must also provide a telephone number.

### **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.