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**[NOTE: THE ICO HAS PUBLISHED NEW GUIDANCE ON USING COOKIES: you can no longer rely on a statement that ‘by continuing to browse your website, the user consents to the use of cookies’ or similar. You need to do is have an effective cookie consent mechanism that obtains opt-in consent to the use of all non-essential cookies, prior to such cookies being fired. When users first land on your site, you must use a cookie consent mechanism that provides information about the cookies you are using. You should also provide more detailed information about the cookies that you use via your Cookie Policy (or Privacy Notice) and link to this from within the cookie consent mechanism. You also need to add a link to either the header or footer of your website, so that the link to the Cookie Policy can be accessed from each page of your website. Rather than just have a link that states “Cookie Policy”, you should make it clearer what this is about by using words such as “Find out more about how our site works and how we put you in control.” Banners, pop-ups etc can still be used, but in order to achieve compliance, these tools must make the position absolutely clear to users. In addition, you cannot have cookies firing on the landing page or have users being able to go to another part of the website where cookies are used without clicking on a consent option. You should not have boxes that emphasise ‘agree’ or ‘allow’ (or presumably ‘accept’) cookies, as opposed to ‘block’ or ‘reject’ cookies, as this influences website users to consent to the use of cookies.]**

**NOTE: WE HOPE TO SHARE OUR SUGGESTED COOKIE CONSENT MECHANISM IN W/C 15 JULY 2019**

**COOKIE POLICY**

**What's a cookie?**

•A "cookie" is a piece of information that is stored on your computer's hard drive if you agree to this and which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit. Cookies can also be used to analyse traffic and for advertising and marketing purposes.

•Cookies are used by nearly all websites and do not harm your system.

We are required to obtain your consent for all non-essential cookies used on our website. You can block cookies (including essential cookies) at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block essential cookies you may not be able to access all or parts of our site.

**How do we use cookies?**

•We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards how you are using our website. This helps us to develop and improve our website as well as products and / or services in response to what you might need or want.

•Cookies are either:

- Session cookies: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any personal data from your computer; or

- Persistent cookies: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. [We use persistent cookies for Google Analytics.] [**PLEASE DELETE IF YOU DO NOT USE GOOGLE ANALYTICS**]

•Cookies can also be categorised as follows:

- Strictly necessary cookies: These cookies are essential to enable you to use the website effectively, such as when buying a product and / or service. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

- Performance cookies: These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.

- Functionality cookies: These cookies allow our website to remember choices you make and provide enhanced features. For instance, we may be able to provide you with news or updates relevant to the services you use. They may also be used to provide services you have requested such as viewing a video or commenting on a blog. The information these cookies collect is usually anonymised.

**-** Targeting cookies: These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

- First and third party cookies: First party cookies are cookies set by our website. Third party cookies are cookies on our website that are set by a website other than our website, such as where we have adverts on our website or use Facebook pixels so that we can show you relevant content from us when you are on Facebook.

**[We use only first party cookies on this website.] / [We use third party cookies on our website and these are set out in the table below.] [NOTE: DELETE AS APPROPRIATE]**

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

|  |  |
| --- | --- |
| **Cookie Title**  **Cookie Name** | **Purpose** |
| **[INSERT COOKIE TITLE]**  **[INSERT COOKIE NAME]** | [**INSERT DESCRIPTION OF THE PURPOSE FOR WHICH THE COOKIE IS USED**]  Examples of purposes for which a cookie may be used:  This cookie [is essential for our site to **OR** enables us to]:  [(a) Estimate our audience size and usage pattern.]  [(b) Store information about your preferences, and so allow us to customise our site and to provide you with offers that are targeted to your individual interests.]  [(c) Speed up your searches.]  [(d) Recognise you when you return to our site.]  [(e) Allow you to use our site in a way that makes your browsing experience more convenient, for example, by allowing you to store items in an electronic shopping basket between visits. If you register with us or complete our online forms, we will use cookies to remember your details during your current visit, and any future visits provided the cookie was not deleted in the interim.]  [(f) [**INSERT OTHER PURPOSES**].] |
| **NOTE: THE FOLLOWING ARE EXAMPLES FROM THE ICO COOKIE POLICY – DELETE THIS SECTION FROM YOUR COOKIE POLICY. IF YOU DON’T KNOW WHAT COOKIES YOU ARE USING, COOKIEBOT PROVIDES A FREE SCAN FOR YOU. I MAKE NO ENDORSEMENT AS TO THE FITNESS FOR PURPOSE OF COOKIEBOT OR OTHERWISE AND YOU USE IT AT YOUR OWN RISK.** | |
| Universal Analytics (Google)  \_ga \_gali \_gat \_gid | These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. |
| Application firewall cookie  \_zjc\* | This cookie is set by a third-party web application firewall from Dyn to help maintain the security and performance of our website. Some traffic may receive a challenge to check if it is genuine and if it is, a cookie is set so the user isn’t challenged again. |
| Security breach notification form cookie  ASP.NET\_SessionId | This cookie is essential for the breach notification form – the form that public electronic communications service providers use to notify the ICO of a security breach – to operate. It is set only for those people using the form. This cookie is deleted when you close your browser. |
| YouTube cookies  PREF\* VSC\* VISITOR\_INFO1\_LIVE\* remote\_sid\* | We embed videos from our official YouTube channel using YouTube’s privacy-enhanced mode. This mode may set cookies on your computer once you click on the YouTube video player, but YouTube will not store personally-identifiable cookie information for playbacks of embedded videos using the privacy-enhanced mode. Read more at [YouTube’s embedding videos information page.](http://www.google.com/support/youtube/bin/answer.py?hl=en-GB&answer=171780)  PREF - \* Expires after eight months VSC - \* expires at the end of your session VISITOR\_INFO1\_LIVE - \*expires after eight months remote\_sid - \* expires at the end of your session |
|  |  |

You can alter your cookie preferences at any time by **[INSERT YOUR MECHANISM FOR DOING THIS EG BY CLICKING ON THE COOKIE ICON AND ADJUSTING THE SLIDERS TO ‘OFF’ ]**. Please refresh your page to ensure that the new settings have taken effect.

You can also control your cookie settings through your web browser.

You can opt out of being tracked by Google Analytics across all websites, by going to <http://tools.google.com/dlpage/gaoptout>.

Except for essential cookies, all cookies will expire after [**INSERT EXPIRY PERIOD**].

If you have any questions about the cookies that we use, feel free to email us at [**INSERT YOUR EMAIL ADDRESS**].