# **Cookies policy**

## 1. Introduction

- 1.1 Our website uses cookies.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

## 2. Credit

2.1 This document was created using a template from SEQ Legal (http://www.seqlegal.com).

## 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.
- 3.4 Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

## 4. Our cookies

- 4.1 We use both session and persistent cookies on our website.
- 4.2 The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:
  - (a) we use \_hs and \_suSession cookies to recognise a computer when a user visits our website, track users as they navigate the website, improve the website's usability and administer the website.

## 5. Analytics cookies

- 5.1 We use Google Analytics to analyse the use of our website.
- 5.2 Our analytics service provider generates statistical and other information about website use by means of cookies.

- 5.3 The analytics cookies used by our website have the following names: [\_ga, \_\_gat, \_\_utma, \_\_utmt, \_\_utmb, \_\_utmc, \_\_utmz and \_\_utmv].
- 5.4 The information generated relating to our website is used to create reports about the use of our website.
- 5.5 Our analytics service provider's privacy policy is available at: [http://www.google.com/policies/privacy/].

## 6. Blocking cookies

- 6.1 Most browsers allow you to refuse to accept cookies; for example:
  - (a) in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
  - (b) in Firefox (version 44) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
  - (c) in Chrome (version 48), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.
- 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. Deleting cookies

- 7.1 You can delete cookies already stored on your computer; for example:
  - (a) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at http://windows.microsoft.com/en-gb/internet-explorer/delete-managecookies#ie=ie-11);
  - (b) in Firefox (version 44), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and
  - (c) in Chrome (version 48), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".
- 7.2 Deleting cookies will have a negative impact on the usability of many websites.

## 8. Our details

- 8.1 This website is owned and operated by SAFE Networks
- 8.2 We are registered in England under charity registration number 1147308, and our registered office is PO Box 483, Manchester, M28 8DJ.
- 8.3 You can contact us:
  - (a) by post, using 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.

## 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.

## 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).

• How will you gain users' consent to the use of cookies?

## Section 2: Credit

Optional element. Although you need to retain the SEQ Legal 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 3.4

Optional element.

## Section 4: Our cookies

#### Section 4.1

• What types of cookies will be used on the website?

## Section 4.2

- Details of cookie used on the website should be provided here.
- Identify the cookie by name.

## Section 5: Analytics cookies

Are cookies used to generate analytics data for the website?

The drafting in this provision assumes that Google Analytics is being used, but can easily be adapted for other cookie-based analytics systems.

## Section 5.1

• Will you use Google Analytics?

## Section 5.3

• What are the names of the analytics cookies used on the website?

## Section 5.5

• At what web address can users view a copy of your analytics service provider's privacy policy?

## Section 6: Third party cookies

Does the website serve any third party cookies to users?

## Section 6.2

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.

• Will Google AdSense interest-based advertisements be published on the website (that is, advertisements tailored to a user's particular interests as Google perceives them)?

## Section 6.3

Optional element.

• In respect of each such third party cookie, specify the name of the cookie and give details of the purposes for which it will be used.

## Section 7: Blocking cookies

## Section 7.3

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

## Section 9: Cookie preferences

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

## Section 9.1

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

## Section 10: 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 10.1

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

## Section 10.2

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 10.3

Optional element.

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

## Section 10.4

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.