

## OVERVIEW OF UK COOKIE CONSENT RULES

EU law requires organisations placing cookies through websites onto visitors' computers to obtain their "consent" after providing clear and comprehensive information about how cookies are used on the websites.

To comply with this, we have taken four steps:

- i. Identified cookies and other tracking technologies served through this website, the purposes they fulfil, and related information such as their expiry and whether they are first or third-party cookies.
- ii. Assessed the intrusiveness of these cookies on visitors' expectations of Privacy, based on the information collected in (i) above.
- iii. Provided 'clear and comprehensive' information about website cookies with the appropriate level of disclosure corresponding with the intrusiveness of each cookie.
- iv. Decided on an appropriate strategy for obtaining consent for website cookies, considering their use and intrusiveness. Certain types of cookie may qualify for legal exemptions and, where this is the case, consent will not be required for these cookies.

## CONSENT STRATEGIES USED ON THIS WEBSITE

European standards for obtaining consent to use cookies and similar tracking technologies (such as tracking pixels and website scripts) ("Cookies") continue to evolve and while prior, express consent strategies (or 'opt-in' strategies) represent the most legally robust solution for obtaining consent, they can impair visitor experience and adversely impact legitimate website data collection.

As an alternative, implied consent strategies enable us to infer consent where visitors do not refuse Cookies (or 'opt-out'), after providing prominent Cookie disclosures and simple, readily-available Cookie controls at a granular level. This enables visitors to accept the Cookies they are happy to receive them and to refuse those they do not accept.

The consent strategy that is appropriate for any given type of Cookie will depend on the intrusiveness of that Cookie, considering:

- who serves the Cookie (i.e. a first or third party)
- what data the Cookie collects
- what purposes it fulfils
- how long it endures
- nature of the website through which it is served.

For Cookies requiring consent, we follow a three-tiered approach for obtaining visitor consent:

- for Cookies of low intrusiveness: we make enhanced disclosures in the Cookie policy and provide an easy means to opt out of Cookies, and infer visitors' consent where they do not refuse Cookies
- for Cookies of medium intrusiveness: we use the same strategy as for low intrusiveness Cookies and make contextual disclosures about Cookie use at

appropriate points on the websites (e.g. making Cookie disclosures around targeted adverts or other website functionality reliant on these Cookies).

- for Cookies of high intrusiveness: we will implement a prior consent strategy (for example, the use of a banner / pop-up requiring visitors to consent to these Cookies before they are served).

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Implied consent for Cookies: Cookies deployed through this website are of low to medium intrusiveness only.

Cookie disclosures by type, rather than by identity: Given the substantial number of Cookies served through websites, the assessment in Annex A does not disclose and assess the intrusiveness of each Cookie individually. Instead, it groups Cookies by category (for example, 'advertising cookies', 'analytics cookies' and so on) and assesses the intrusiveness of each category, considering the specific features of the Cookies that are within that category. This enables Cookie disclosures that are simpler and clearer for consumers to understand.

NOTE: An assessment of the Cookie types served through this website appears in Annex A and provides information about its purpose(s), expiry and information on refusing the Cookies in "How to Block."

## **LINKS TO OTHER WEB SITES**

This site may contain links or references to other websites. Please be aware that we do not control the Cookies / tracking technologies of other websites and this Cookie Policy does not apply to those websites.

## **HOW TO CONTACT US**

If you have any questions, comments, or concerns about this Cookie Policy or the information practices of this site, please contact us as follows

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