



## COOKIES POLICY

<b>Version:</b>	Rev 04	
<b>Date of version:</b>	04 April 2023	
<b>Created by:</b>	Shaun Beresford (Moore ClearComm)	
<b>Approved by:</b>	 Michael Morgan   QA Manager	 Gary Dew   Operations Director



REVISION HISTORY			
Date	Rev.	Created By	Description Of Change
19/04/2021	01	Shaun Beresford	First draft.
30/04/2021	02	Shaun Beresford	Second draft.
14/10/2021	03	Michael Morgan	Branding updated and document formatted, approved by Michael Morgan.
04/04/2023	04	Michael Morgan	Reviewed policy.



## CONTENTS

<b>1. INTRODUCTION</b>	.....ERROR! BOOKMARK NOT DEFINED.
<b>2. SCOPE</b>	.....ERROR! BOOKMARK NOT DEFINED.
<b>3. PURPOSE</b>	.....ERROR! BOOKMARK NOT DEFINED.
<b>4. PUBLICATION</b>	.....ERROR! BOOKMARK NOT DEFINED.
<b>5. REVIEW</b>	.....ERROR! BOOKMARK NOT DEFINED.
<b>6. COMPLIANCE</b>	.....ERROR! BOOKMARK NOT DEFINED.
<b>7. DISCIPLINARY ACTION</b>	.....ERROR! BOOKMARK NOT DEFINED.
<b>APPENDIX 1 – INFORMATION TO BE INCLUDED IN THE COOKIE POLICY</b>	.....ERROR! BOOKMARK NOT DEFINED.
<b>APPENDIX 2 – COOKIE POLICY [PUBLIC FACING]</b>	.....ERROR! BOOKMARK NOT DEFINED.
<b>APPENDIX 3 – COOKIE BANNER [PUBLIC FACING]</b>	.....ERROR! BOOKMARK NOT DEFINED.



## 1. Introduction

As a data controller, ESG is aware of its responsibilities under the Data Protection Act 2018 (DPA 2018), the UK General Data Protection Regulation (UK GDPR) and the Privacy Electronic Communications Regulations (PECR) 2003 (as amended).

ESG acknowledges that it is required to facilitate the rights of data subjects, including the 'Right to be informed', which includes making people aware of the information that ESG collects using cookies, deployed on its website, and how the information it gathers is used.

## 2. Scope

2.1 This policy applies to the Directors, Trustees, staff, consultants, and contractors (hereafter, collectively referred to as 'staff'), who are responsible for giving effect to this policy, and in part, to the public who access the ESG website.

2.2 This policy applies to all formats of information, including electronic data and manuscript records.

## 3. Purpose

3.1 This policy sets out the key principles which must be followed when using cookies to collect personal data. It should be read in conjunction with the General Data Protection Policy and the ESG Privacy Notice.

## 4. Publication

4.1 The 'Cookie Policy' is to be drafted using the information at Appendix 1 as appropriate.

4.2 The 'Cookie Policy' at Appendix 2 has been drafted using the information at Appendix 1, as it applied when this policy came into effect. This policy is to be published on the ESG website.

4.2 The 'Cookie Banner' at Appendix 3 is to be made available to anyone visiting the ESG website to enable them to make appropriate choices in relation to the use of cookies.

## 5. Review

5.1 The content of both the 'Cookie Policy' and the 'Cookie Banner' must be reviewed regularly by ESG, and the information contained therein should be updated where necessary to reflect the true use of cookies by ESG.

## 6. Compliance

6.1 Any new collection of personal data using cookies is to be brought to the attention of the Creative Department and/or QA Department, before the new collection of personal data begins.

## 7. Disciplinary Action

7.1 Protecting personal data is vital not only to maintain the trust placed in ESG by its members and the public but also to demonstrate ESG's commitment to data protection.

7.2 Accordingly, all members are to adhere to this policy and its intent. Failure to do so may result in disciplinary action being taken.



## Appendices

Appendix 1 – Information to be included in the Cookie Policy.

Appendix 2 – Cookie Policy [Public facing].

Appendix 3 – Cookie Banner [Public facing].



## Appendix 1 – INFORMATION TO BE INCLUDED IN THE COOKIE POLICY

*[Only the information applicable to the cookies being used by ESG should be copied from this Appendix to the public facing 'Cookie Policy']*.

### STRICTLY NECESSARY COOKIES

Strictly necessary cookies (known as “Essential cookies”) enable core functionality such as page navigation and access to secure areas. These cookies do not gather information about you that could be used for marketing purposes and they do not remember when you have been on the internet. You may disable these cookies by changing your browser settings, but this may affect how our website functions during your interactions with us (see below).

### NON-ESSENTIAL Cookies

#### Analytical Cookies

We'd like to set Google Analytics cookies to help us to improve our website by collecting and reporting information on how you use it. The cookies collect information in a way that does not directly identify anyone.  
Functionality Cookies

These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).  
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 the advertising displayed on our website more relevant to your interests. We may also share this information with third parties for this purpose.

#### Marketing Cookies

We also use a marketing database management program that deploys a cookie when a client interacts with a marketing communication, such as a marketing email or a marketing based landing page on our website. This cookie collects personal data, such as your name, which pages you visit on our website and your history arriving at our website. Collected information is used to evaluate the effectiveness of our marketing campaigns or to provide better targeting for marketing.

#### Statistics

Statistical cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously. The statistical data we collect about your browsing actions and patterns does not identify any individual. The table below explains the cookies we use and why. Each cookie is listed by name, along with what it is used for and how long it is set to last.

*[Embed the table of cookies used in the Cookie Policy and make available on the webpage.]*

#### Third Party Cookies

Third-party cookies are set by a domain other than the one the user is visiting. This typically occurs when the website incorporates elements from other sites, such as images, social media plugins or advertising. When the browser or other software fetches these elements from the other sites, they can set cookies as well.



ESG does not control the use of these third-party cookies and cannot access them due to the way that cookies work, as cookies can only be accessed by the party who originally set them. Please check the third-party websites for more information about these cookies.

### **Social Media**

Social media cookies allow users to interact more easily with social media, such as Facebook, Twitter, LinkedIn, Instagram, YouTube etc. Please refer to the relevant social media platforms privacy policies for information about their cookies.



## **Appendix 2 – Cookie Policy [Public facing]**

*[A link to this policy is to be provided on the 'Homepage' of the ESG website]*

### **ABOUT THIS POLICY**

This Cookie Policy tells you what to expect when our website collects personal information. It applies to the information we collect about our visitors, and those who login to our website.

### **WHAT ARE COOKIES?**

A 'cookie' is a small text file that is delivered by our website server onto your computer whilst you visit our website, which can subsequently be used by the website to identify particular devices and thereby remember your website preferences and login details. Most cookies will not collect information that identifies you and instead will collect more general information such as how you arrived at and used our website, or your general geographical location.

#### **Types of Cookie**

Session cookies are temporary and expire once you close your browser (or once your session ends). Persistent cookies category encompasses all cookies that remain on your hard drive until you erase them, or your browser does, depending on the cookie's expiration date. All persistent cookies have an expiration date written into their code, but their duration can vary. According to the ePrivacy Directive (Directive 2002/58/EC), they should not last longer than 12 months, but in practice, they could remain on your device much longer if you do not take action.

First-party cookies, similarly to as the name implies, first-party cookies are put on your device directly by the website you are visiting.

Third-party cookies are placed on your device, not by the website you are visiting, but by a third-party like an advertiser or an analytic system.

### **WHY ARE COOKIES NEEDED?**

Cookies make websites work better and they are a standard part of most modern websites. For example, they remember the items you've placed in your online shopping cart so that the items appear at the checkout when you make your purchase. Another example would be when you login to webmail services such as Hotmail or Gmail: on such occasions a cookie is generated that confirms you are logged in and when you log off, the cookie is deleted. This means if someone goes back to your webmail address on your computer, you will still be logged out – and they won't be able to read your emails.

More detail on how businesses use cookies is available at: [www.allaboutcookies.org](http://www.allaboutcookies.org)

### **WHAT COOKIES DO WE USE?**

We collect your data automatically via cookies when you visit our website, in line with the cookie settings in your browser, and through the cookies that you activated when you selected various options on our cookie banner i.e. your customised cookie settings.

We use cookies to track your activity to help ensure you get the best possible experience when visiting our website for example, if you are using a shared computer, that you stay logged out when you leave our website.





We do not make any attempt to discover the identities of anyone who visits our website, and we will not associate any of the data gathered from our website with any personally identifiable information from any source. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

### **Strictly necessary cookies**

Strictly necessary cookies (otherwise known as “Essential cookies”) enable core functionality such as page navigation and access to secure areas. These cookies do not gather information about you that could be used for marketing purposes and they do not remember when you have been on the internet. You may disable these cookies by changing your browser settings, but this may affect how our website functions during your interactions with us (see relevant section below).

### **Non-essential Cookies**

We only use strictly necessary cookies as described above. We do not use non-essential i.e. analytical, performance or marketing cookies to collect data from you.

### **I DON'T CONSENT TO THE USE OF COOKIES – WHAT CAN I DO?**

You can turn off cookies for a particular website or several sites, by adjusting your browser settings to prevent it from accepting cookies. However, it's important to note that turning off cookies is likely to limit the functionality of not only our website, but also the functionality of a large number of the world's websites, and accordingly, your experience of ours and other websites may be impaired because data is no longer being captured about your interactions.

### **Enabling and disabling browser settings**

You can enable and disable browser settings as follows:

#### **Google Chrome**

- Click the wrench icon on the browser toolbar
- Select Settings
- Click 'Show advanced settings'
- In the "Privacy" section, click the 'Content settings' button
- To enable cookies in the "Cookies" section, pick 'Allow local data to be set', this will enable both first-party and third-party cookies. To allow only first-party cookies pick 'Block all third-party cookies without exception'
- To disable cookies, in the "Cookies" section, pick 'Block sites from setting any data'
- Various levels of cookie enablement and disablement can be found here
- Microsoft Internet Explorer 6.0, 7.0, 8.0
- Click on 'Tools' at the top of your browser window and select 'Internet Options'
- In the options window navigate to the 'Privacy' tab
- To enable cookies: Set the slider to 'Medium' or below
- To disable cookies: Move the slider to the top to block all cookies
- Various levels of cookie enablement and disablement can be found here

#### **Mozilla Firefox**

- Click on 'Tools' at the browser menu and select 'Options'
- Select the Privacy panel
- To enable cookies: Check 'Accept cookies for sites'
- To disable cookies: Uncheck 'Accept cookies for sites'



- Various levels of cookie enablement and disablement can be found here

#### **Opera**

- Click on 'Setting' at the browser menu and select 'Settings'
- Select 'Quick Preferences'
- To enable cookies: check "Enable Cookies"
- To disable cookies: uncheck "Enable Cookies"
- Various levels of cookie enablement and disablement can be found here

#### **Safari on OSX**

- Click on 'Safari' at the menu bar and select the 'Preferences' option
- Click on 'Security'
- To enable cookies: In the 'Accept cookies' section select 'Only from site you navigate to'
- To disable cookies: In the 'Accept cookies' section select 'Never'
- Various levels of cookie enablement and disablement can be found here

#### **All other browsers**

- Look for a the "help" function in the browser or contact the browser provider.

You can learn how here or follow the links below:

#### **I'M CONCERNED ABOUT SPYWARE – WHAT CAN I DO?**

It may be that your concerns around cookies relate to so called “spyware” and in which case, rather than switching off cookies in your browser, you may find that anti-spyware software achieves the same objective by automatically deleting cookies considered to be invasive. Learn more about managing cookies with antispyware software here

#### **WHAT IF I WANT TO MAKE A COMPLAINT?**

We hope you will never have reason for doing so, but if you wish to complain about our use of cookies and similar technologies, please email our Data Protection Contact at: [info@esglimited.com](mailto:info@esglimited.com)

Alternatively, you can submit your complaint by post to:

The Viking Business Centre  
Danes Rd  
Romford  
RM7 0HL

You also have the right to lodge a complaint with the UK Regulator, the Information Commissioner's Office (“ICO”). For further information about your data subject rights and how to complain to the ICO, can be found at: <https://ico.org.uk/concerns>

#### **CHANGES TO OUR COOKIES POLICY**

This ‘Cookies Policy’ was last updated/reviewed 04/04/2023.



### Appendix 3 – Cookie Banner [Public facing]

*[The following 'Cookie Banner' is to be made available on the ESG website]*

#### OUR USE OF COOKIES

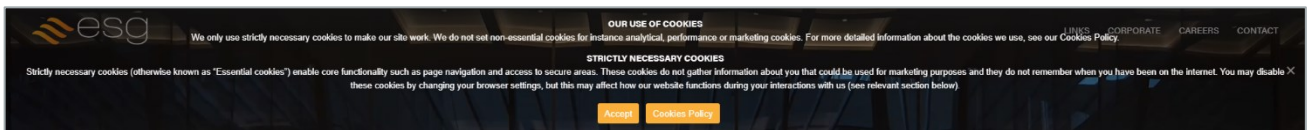
We only use strictly necessary cookies to make our site work. We do not set non-essential cookies for instance analytical, performance or marketing cookies.

For more detailed information about the cookies we use, see our Cookies Policy.

---

#### STRICTLY NECESSARY COOKIES

Strictly necessary cookies (otherwise known as “Essential cookies”) enable core functionality such as page navigation and access to secure areas. These cookies do not gather information about you that could be used for marketing purposes and they do not remember when you have been on the internet. You may disable these cookies by changing your browser settings, but this may affect how our website functions during your interactions with us (see relevant section below).



*[NB: only information applicable to the cookies being used by ESG should appear on the public facing 'Cookie Banner']*.