

Document owner: TPMG Group Services Ltd / Shared Services Hub

Policy owner: Giedre Beige

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Policies and governance

Cait Group Ltd is part of the TPMG Group and is supported by **TPMG Group Services Ltd**, operating as **Shared Services Hub**, for selected governance, administration, document-control and compliance-support functions.

Certain policies are maintained centrally through Shared Services Hub and adopted by relevant TPMG Group businesses. Where a policy applies to a specific company, the applicable legal entity is identified within the policy, schedule or related notice.

Cookie Policy

1. Introduction

This Cookie Policy explains how Cait Group uses cookies and similar technologies on www.cait-group.co.uk

Cookies help websites function, remember choices, improve performance, understand how visitors use a site, and support certain third-party features. Some cookies are strictly necessary for the website to operate. Others are optional and will only be used where you have given the relevant consent.

This Policy should be read alongside our **Privacy Notice**, which explains how we use personal data more generally.

2. What Are Cookies?

Cookies are small text files placed on your computer, smartphone, tablet or other device when you visit a website.

Cookies can:

- help a website function properly;

- remember settings or preferences;
- improve security and performance;
- help website operators understand how visitors use a site; and
- support embedded services, analytics or marketing tools.

PECR applies not only to cookies themselves, but also to similar technologies that store or access information on a user's device. ICO guidance makes clear that similar technologies can include things such as local storage, tags, pixels and related tracking tools.

3. What Is “Cookie Law”?

For the purposes of this Policy, “Cookie Law” means the relevant rules in the **Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR)**, together with the UK data protection framework where personal data is involved. Regulation 6 of PECR is the key rule dealing with cookies and similar technologies.

4. Information About Us

Cait Group Ltd is part of the TPMG Group and is supported by **TPMG Group Services Ltd**, operating as **Shared Services Hub**

Company Number: 15920270

Registered Office / Head Office:

Cardinal Point
Park Road
Rickmansworth
WD3 1RE

Telephone: 020 3000 7502

General Enquiries: admin@cait-group.co.uk

Data Protection Officer: dpo@cait-group.co.uk

Website: www.cait-group.co.uk

5. How We Use Cookies

Cait Group may use cookies and similar technologies for the following purposes:

- to make the website work properly;
- to remember your cookie preferences;
- to support security and website integrity;
- to understand how visitors use the site;
- to improve website performance and user experience;
- to support embedded third-party content where used; and
- to support analytics or marketing tools where enabled and consented to.

Your uploaded guidance notes and cookie template use the same broad structure, distinguishing strictly necessary, analytics, functionality, targeting and third-party cookies, and requiring them to be explained clearly to users.

6. Categories of Cookies We May Use

6.1 Strictly Necessary Cookies

These cookies are essential for the website to operate properly and securely. They may support functions such as page navigation, security, load balancing, form submission, session management, payment-related steps, or cookie preference storage.

These cookies do **not** require consent under PECR where they are genuinely necessary, but users must still be informed about them. ICO guidance says strictly necessary cookies are exempt from the consent requirement, but not from the requirement to provide clear information.

6.2 Analytics Cookies

These cookies help us understand how the website is used, such as which pages are visited, how users move around the site, and whether content is working well.

Analytics cookies are typically optional and should only be set where the relevant consent has been given. ICO guidance says analytics cookies are not usually strictly

necessary and normally require consent.

6.3 Functionality Cookies

These cookies remember choices or support enhanced website features, such as saved preferences, embedded tools, media players, or personalisation.

Some functionality cookies may be necessary, but many are optional and require consent depending on what they do.

6.4 Performance Cookies

These cookies help us monitor website performance, speed and reliability and identify issues or areas for improvement.

Where these are not strictly necessary, they are treated as optional and subject to consent.

6.5 Targeting or Advertising Cookies

If used, these cookies help track browsing behaviour or help deliver more relevant content, campaigns or advertising.

These are not strictly necessary and require consent before being set. ICO guidance highlights behavioural tracking and similar advertising uses as more privacy-intrusive and requiring clear consent.

6.6 Third-Party Cookies

Some cookies may be set by third-party services used on the website, such as analytics providers, video platforms, embedded content providers, maps, form tools, chat tools, or consent platforms.

These third parties may also process personal data in accordance with their own privacy and cookie notices.

7. First-Party and Third-Party Cookies

First-party cookies

These are cookies set directly by Cait Group or by tools operating on our website on our behalf.

Third-party cookies

These are cookies set by services, providers or platforms other than Cait Group when you interact with embedded content or integrated services on the website.

Your uploaded cookie guidance notes explain the same distinction and recommend that both first-party and third-party cookies are identified clearly as part of a cookie audit.

8. Session Cookies and Persistent Cookies

Session cookies

These are temporary cookies that remain on your device only while your browser session is active and are usually deleted when you close your browser.

Persistent cookies

These remain on your device for a set period or until you delete them.

Where persistent cookies are used, they should not remain for longer than is necessary for their purpose. Your guidance notes specifically recommend reviewing persistence periods and shortening them where they appear excessive.

9. Consent and Cookie Controls

When you first visit our website, you will be presented with a cookie banner or cookie preference tool.

This tool is intended to:

- explain that cookies are used;

- allow you to accept or reject non-essential cookie categories;
- enable you to manage your cookie preferences; and
- allow you to revisit and change those preferences later.

Cait Group aims to ensure that non-essential cookies are not placed until the relevant consent has been given. ICO guidance says consent must involve a clear affirmative action and that simply continuing to use the site is not enough. It also says users should be able to reject non-essential cookies as easily as they can accept them.

You can also control cookies through your browser settings, although disabling some cookies may affect parts of the site.

10. Changing or Withdrawing Your Consent

You can change your cookie preferences at any time by using the **Cookie Preferences** link or button made available on the website.

You may also delete cookies through your browser settings. However:

- some parts of the website may not work properly afterwards; and
- your preferences may reset and need to be entered again.

Your uploaded cookie guidance notes also say that users should be able to revisit preferences easily after their first visit and that a one-time pop-up alone is usually not enough.

11. Browser Controls

Most browsers allow you to:

- see which cookies are stored;
- block all cookies;
- block third-party cookies only;
- delete cookies;
- clear website data when the browser closes; and
- manage privacy settings for specific sites.

Browser settings alone are not normally enough to meet website consent requirements, but they are still a useful additional control for users. ICO guidance says relying only on browser settings is not generally recommended for consent purposes.

You can usually find more information in your browser's help section.

12. Personal Data and Cookies

Some cookies may involve the processing of personal data, particularly where they:

- identify a device or browser over time;
- collect IP address or other online identifiers;
- track visits or user activity;
- connect website behaviour to a user profile; or
- are combined with other information that can identify an individual.

Where cookies involve personal data, our handling of that data is also governed by our **Privacy Notice** and wider data protection obligations.

Your own guidance notes stress that cookie data can amount to personal data, including where online identifiers are involved, and that website operators should err on the side of caution. ICO guidance takes the same position.

13. Third-Party Services and Embedded Content

If Cait Group uses third-party tools or embedded content on the website, those services may place their own cookies or use similar technologies.

Examples may include:

- analytics services;
- video or webinar platforms;
- map services;
- embedded forms;
- payment services;
- chat or support tools;

- social sharing tools; and
- consent management platforms.

Cait Group does not control third-party cookies once they are set by those providers. Users should also review the relevant third-party privacy and cookie information where appropriate.

14. How Often We Review This Policy

We may update this Cookie Policy:

- when cookies or website tools change;
- when new third-party services are added or removed;
- when the website structure changes;
- when legal or regulatory guidance changes; or
- when our cookie banner or consent tool is updated.

Updated versions will be published on the website with a revised effective date.

Your uploaded templates and guidance notes both expect cookie policies to be reviewed and updated when website activity changes.

15. Contact

If you have any questions about this Cookie Policy or about how Cait Group uses cookies and similar technologies, please contact:

Cait Group Ltd, a company registered in England and Wales under company number 15920203

16. Related Documents

Please also see:

- **Privacy Notice**
- **Website Terms of Use**
- **Cookie Preferences**