RKJOnline Cookie & Similar Technologies Policy

This Privacy Notice forms part of the Terms and Conditions of RKJOnline.

Clients should pay particular notice to our Terms and Conditions, Privacy Notice for Clients as well as this policy

RKJOnline is a tradename of RKJ Consulting Ltd.

(Note this document owes credit in part to the Information Commissioners Office and this link & its subsequent pages https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies / and https://ico.org.uk/for-the-public/online/cookies/

(Please also see ICO copyright statement https://ico.org.uk/global/copyright-and-re-use-of-materials/)

To clarify, substantial material is obtained from the Information Commissioner's Office website as at 26/4/2018, licensed under the Open Government Licence.

RKJ Consulting Limited trades as RKJOnline for the purposes of Web Design, Web Hosting, Search Engine Optimisation (SEO) & Social Media services

Note "RKJWebDesign" is also a logo / brand name of RKJOnline.
Note also that RKJOnline is sometimes known as "RKJOnline Web Design Cheshire".

This Privacy Notice has specifically been created with the General Data Protection Regulation "GDPR" in mind (more info below).

Effective Date: 25th May 2018
Review Date: The next review will be 25th November 2018
Ad Hoc reviews and changes may be necessary – see below.

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1: INTRODUCTION

We believe in the interests of transparency and showing respect for your privacy, RKJOnline should explain how we use cookies and similar technologies on our website www.rkjonline.com.

The information we provide and options we outline is with full regard to the UK Privacy and Electronic Communications Regulations (PECR) which are in force at the time of publication of this policy. PECR implemented the EU "Cookie Directive" https://cookiepedia.co.uk/eu-cookie-law

Overall, our cookies help us give you with a good experience when you browse our website and also allow us to maintain, improve and keep safe our site.

A list of our cookies is below in section 4.

By continuing to browse the site, you are agreeing to our use of cookies.

We are aware that as at 25th May 2018, The General Data Protection Regulations (GDPR) comes into force and it is envisaged that later in 2018 the new updated ePrivacy Regulation (ePR), will also come into force "to better protect people's privacy in the digital age".
We know that cookies are mentioned only once in the GDPR but it's clear that GDPR underlines that in using cookies, it may be possible to identify an individual - and that is classified as "personal data". The GDPR seeks to protect individuals' personal data and how it is gathered, held and processed – as such we expect further rules on cookies to come from GDPR / ePR.

As of date of publication of this policy, changes to PECR / launch of "ePR" (to, for want of a better term, "Upgrade" to GDPR) are not clear. As far as RKJOnline's extensive research has found, the regulators website (https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/) still refers to PECR.

As such RKJOnline is continuing to comply with PECR albeit this Cookie Policy is updated to be more transparent and clear.

We attempt to follow the current regulations as follows (from the ICO website):

"What do we need to do to comply?"

The rules on cookies are in regulation 6. The basic rule is that you must:

- tell people the cookies are there;
- explain what the cookies are doing and why; and
- get the person's consent to store a cookie on their device.

As long as you do this the first time you set cookies, you do not have to repeat it every time the same person visits your website. However, bear in mind that devices may be used by different people. If there is likely to be more than one user, you may want to consider repeating this process at suitable intervals."

The rest of this document follows those guidelines above.

Also, in anticipating GDPR / "ePR" influences on use of cookies, we have:-

- re-written our Cookie Policy, taking it out of the general "Terms and Conditions" and making it more clear to find on our website

- mentioned below where we rely on "legitimate interests" rather than "consent" for cookies, where appropriate

2: WHAT ARE COOKIES?

As the Information Commissioners Office website explains "A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, e.g. remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

The rules on cookies are covered by the Privacy and Electronic Communications Regulations. The Regulations also cover similar technologies for storing information, e.g. Flash cookies. The Regulations were revised in 2011, and the ICO is responsible for enforcing these rules"

3: TYPES OF COOKIES

The ICO Cookies Guidance
https://ico.org.uk/media/fororganisations/documents/1545/cookies_guidance.pdf explains:-

Session and persistent cookies:-
Cookies can expire at the end of a browser session (from when a user opens the browser window to when they exit the browser) or they can be stored for longer. The Privacy and Electronic Communications Regulations apply to both types of cookies:

- **Session cookies** – allow websites to link the actions of a user during a browser session. They may be used for a variety of purposes such as remembering what a user has put in their shopping basket as they browse around a site. They could also be used for security when a user is accessing internet banking or to facilitate use of webmail.
  These session cookies expire after a browser session so would not be stored longer term. For this reason session cookies may sometimes be considered less privacy intrusive than persistent cookies.
- **Persistent cookies** – are stored on a users' device in between browser sessions which allows the preferences or actions of the user across a site (or in some cases across different websites) to be remembered. Persistent cookies may be used for a variety of purposes including remembering users' preferences and choices when using a site or to target advertising.
- **First and third party cookies** – Whether a cookie is 'first' or 'third' party refers to the website or domain placing the cookie. First party cookies in basic terms are cookies set by a website visited by the user - the website displayed in the URL window. Third party cookies are cookies that are set by a domain other than the one being visited by the user. If a user visits a website and a separate company sets a cookie through that website this would be a third party cookie.

4: RKJONLINE WEBSITE COOKIES – WHAT DO WE HAVE, WHAT DO THEY DO AND WHY?

RKJOnline does not use cookies (or analytics) to gather, store or process any kind of personal data.

The RKJOnline website uses 3 cookies:-

- The **"bb2_screener_" cookie is** set by the "Bad Behaviour" anti-spam plug-in **which RKJOnline has put on its website.**
  The purpose of the plugin is: "Deny automated spam bots access to your PHP-based Web site." i.e. the plug-in helps to improve website security.

  This is categorised as a "**Session Cookie**" and has a functional purpose - it is used solely for the security of the website and **expires at the end of your browser session**. RKJOnline does not collect, hold or process any information from this cookie

  As such RKJOnline believes that we have a **legitimate interest** in using this plugin and cookie as it is necessary to help secure the website from unscrupulous attacks; it is thus helping to keep our business secure.

  Please contact us for more information about the work of this plugin.

- The **"viewed_cookie_policy"** cookie is part of a popular (well used) plugin called **"Cookie Law Info" which is put on our website by RKJOnline.** This **"**uses implied consent, adding a subtle banner to your website either in the header or footer so you can show your compliance status regarding the new EU Cookie Law".
  The cookie checks to ensure that the website visitor has been shown the cookie banner (and thus the option to accept). The "viewed_cookie_policy" is set to "yes" when the Cookie law info bar has been viewed and accepted.

  This is categorised as a persistent "strictly necessary" cookie.
  (Categories can be found in the International Chamber of Commerce (ICC) UK Cookie Guide; the guide says of "strictly necessary" cookies "These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided".)
  https://www.cookielaw.org/media/1096/icc_uk_cookiesguide_revnov.pdf

  The duration of the cookie is 1 year but of course you can manage cookie usage and delete cookies through your browser settings – see our section 3 below "How can I control my cookies"?

RKJOnline believes that we have a **legitimate interest** in using this plugin and cookie as it is necessary for our business to comply with current cookie law at time of publication of this policy. It is THE measure that alerts visitors to cookies on the site. This could also be argued as "legal obligation".

- We are also aware of a third cookie – NOT specifically put on site through any plugin we have used.
  This is **"PHPSESSID".** Cookiepedia says of this cookie "Cookie generated by applications based on the PHP language. This is a general purpose identifier used to maintain user session variables. It is normally a random generated number, how it is used can be specific to the site, but a good example is **maintaining a logged-in status for a user between pages**. The main purpose of this cookie is: **Strictly Necessary"**
  https://cookiepedia.co.uk/cookies/PHPSESSID
  RKJOnline stores NO personal information from this cookie.

5: HOW CAN I CONTROL MY COOKIES? OPTING IN AND OUT

As the Information Commissioners Office website explains:

Browser controls (Thank you to the ICO website):-

You can use your web browser to:

- delete all cookies;
- block all cookies;
- allow all cookies;
- block third-party cookies;
- clear all cookies when you close the browser;
- open a 'private browsing' / 'incognito' session, which allows you to browse the internet without storing local data; and
- Install add-ons and plug-ins to extend browser functionality.

Where to find information about controlling cookies (Thank you to the ICO website):-

- Internet Explorer cookies information
- Chrome cookies information
- Firefox cookies information
- Safari cookies information

- [Opera cookies information](#)

RKJOnline would like to add:-

- [iPhone and iPad](#)

- [Samsung](#)

- Advice to clear **cache** as well as cookies:
  https://support.google.com/accounts/answer/32050

- Additionally, if you want to opt out of specific third-party cookies, you should consult the specific third party's website or cookie/privacy policy in addition to your browser's cookie settings.

- **Google Analytics (not used by RKJOnline):-**
  Visit https://tools.google.com/dlpage/gaoptout :- "to provide website visitors the ability to prevent their data from being used by Google Analytics".

Other Useful Information (Thank you to the ICO website):-

- A number of websites provide detailed information on cookies, including [AboutCookies.org](#) and [AllAboutCookies.org](#).

- The Internet Advertising Bureau website [Your Online Choices](#) allows you to install opt-out cookies across different advertising networks.

- Google has developed a browser add-on to allow users to [opt-out of Google Analytics](#) across all websites which use this popular analytics product.

- New technologies such as Mozilla's [Do Not Track](#) allow you to tell websites not to track you.

- Internet Explorer has a feature called [Tracking Protection Lists](#) which allows you to import a list of websites you want to block.

Opting out may give you a less enhanced user experience.

6: TO CONTACT US OR REPORT YOUR COOKIE CONCERNS:

If you have any questions or comments or you wish to make a complaint, please email your usual RKJOnline contact or use this email address:- gdpr@rkjonline.com

If we cannot resolve your complaint and wish to escalate it, you may contact the regulator – the **Information Commissioner's Office**   - who is responsible for handling complaints about the use of personal information.

You may also report Cookie concerns to the ICO. This helps ICO to "find out how organisations

are complying with the cookie law. Rather than reply to each person individually, we will publish information about numbers and types of concerns reported, and let you know what we're doing about them".

Report Cookie Concerns to ICO here: https://wh.snapsurveys.com/s.asp?k=150296439091

Contact the ICO as follows: https://ico.org.uk/global/contact-us/
"Our helpline and live chat services are usually available between 9am and 4:30pm, Monday to Friday (excluding bank holidays)."

Helpline: - 0303 123 1113

https://ico.org.uk/concerns/ to "Report a Concern"

Contact Form at: https://ico.org.uk/global/contact-us/email/

Postal Address of Head Office: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

7: CHANGES TO THIS COOKIE POLICY

RKJOnline reserves the right to amend or update this Cookie Policy at any time. The updates or amendments are effective immediately. If we believe that any of the changes are substantial, we'll let our clients and employees know, usually by email.
It is however our clients and employees responsibility to check back and review the Cookie Policy regularly for any changes.

**Clients & employees should pay particular notice to our Terms and Conditions
and to our Client / Employee Privacy Notices as well as this Cookie Policy.**