



HAIG HOUSING TRUST

COOKIE POLICY

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HAIG HOUSING TRUST COOKIE POLICY

BACKGROUND:

Haig (www.haighousing.org.uk) uses Cookies and similar technologies to distinguish you from other users. By using Cookies, we are able to provide you with a better experience and improve our understanding of how you use our website (Site).

If you do not agree to this policy, please stop using this Site immediately.

1. Definitions and Interpretation

1.1 In this Cookie Policy, unless the context otherwise requires, the following expressions have the following meanings:

- “Cookie”** means a small file placed on your computer or device when you visit certain parts of, or use certain features of Our Site;
- “Cookie Law”** means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 and of EU Regulation 2016/679 General Data Protection Regulation (“GDPR”);
- “Personal data”** means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data, as defined by EU Regulation 2016/679 General Data Protection Regulation (“GDPR”); and
- “We/Us/Our”** means Haig Housing Trust, a limited company registered in England under company number 6593129, whose registered address is Alban Dobson House, Green Lane, Morden SM4 5NS.

2. Information About Us

- 2.1 Our registered office is Alban Dobson House, Green Lane, Morden SM4 5NS. Our Site is operated on our behalf by DCSL Software Ltd, a limited company registered in England and Wales under company number 04126477, whose registered office is 50-58 Victoria Road, Farnborough GU14 7PG.
- 2.2 The person responsible within Haig for data protection matters is the Corporate Director, who can be contacted by email at enquiries@haighousing.org.uk, by telephone on 020 8685 5777, or by post at Alban Dobson House, Green Lane, Morden SM4 5NS.
- 2.3 Haig is regulated by the Charity Commission, the Information Commissioner’s Office (ICO) and the Fundraising Regulator.
- 2.4 We are a member of the Confederation of British Service Charities (Cobseo), the National Housing Federation and the Housing Ombudsman Service.

3. How Does Our Site Use Cookies?

- 3.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen

these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

3.2 By using Our Site, you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Currently we do not permit third party Cookies on Our Site.

3.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law. We may use some or all of the following types of Cookie:

3.3.1 Strictly Necessary Cookies

A Cookie falls into this category if it is essential to the operation of Our Site, supporting functions such as logging in, your shopping basket, and payment transactions.

3.3.2 Analytics Cookies

It is important for Us to understand how you use Our Site, for example, how efficiently you are able to navigate around it, and what features you use. Analytics Cookies enable Us to gather this information, helping Us to improve Our Site and your experience of it.

3.3.3 Functionality Cookies

Functionality Cookies enable Us to provide additional functions to you on Our Site such as personalisation and remembering your saved preferences. Some functionality Cookies may also be strictly necessary Cookies, but not all necessarily fall into that category.

3.3.4 Targeting Cookies

It is important for Us to know when and how often you visit Our Site, and which parts of it you have used (including which pages you have visited and which links you have visited). As with analytics Cookies, this information helps us to better understand you and, in turn, to make Our Site and advertising more relevant to your interests. Some information gathered by targeting Cookies may also be shared with third parties.

3.3.5 Third Party Cookies

Third party Cookies are not placed by Us; instead, they are placed by third parties that provide services to Us and/or to you. Third party Cookies may be used by advertising services to serve up tailored advertising to you on Our Site, or by third parties providing analytics services to Us (these Cookies will work in the same way as analytics Cookies described above).

3.3.6 Persistent Cookies

Any of the above types of Cookie may be a persistent Cookie. Persistent Cookies are those which remain on your computer or device for a predetermined period and are activated each time you visit Our Site.

3.3.7 Session Cookies

Any of the above types of Cookie may be a session Cookie. Session Cookies are temporary and only remain on your computer or device from the point at which you visit Our Site until you close your browser. Session Cookies are deleted when you close your browser.

- 3.4 Cookies on Our Site are not permanent and will expire as indicated in the table below.
- 3.5 For more details of the personal data that We collect and use, the measures We have in place to protect personal data, your legal rights, and our legal obligations, please refer to our Privacy Policy which can be found on our website here: <http://www.haighousing.org.uk/privacy-policy>.
- 3.6 For more specific details of the Cookies that We use, please refer to the table below.

4. What Cookies Does Our Site Use?

4.1 Name of Cookie	Purpose & Type
Google__utma cookie	A persistent cookie – remains on a computer, unless it expires or the cookie cache is cleared. It tracks visitors. Metrics associated with the Google __utma cookie include: first visit (unique visit), last visit (returning visit). This also includes Days and Visits to purchase calculations which afford ecommerce websites with data intelligence around purchasing sales funnels.
Google utmb cookie & __utmc cookie	These cookies work in tandem to calculate visit length. Google __utmb cookie demarks the exact arrival time, then Google __utmc registers the precise exit time of the user. Because __utmb counts entrance visits, it is a session cookie, and expires at the end of the session, e.g. when the user leaves the page. A timestamp of 30 minutes must pass before Google cookie __utmc expires. Given__utmc cannot tell if a browser or website session ends. Therefore, if no new page view is recorded in 30 minutes the cookie is expired. This is a standard ‘grace period’ in web analytics. Ominture and WebTrends among many others follow the same procedure.
Google __utmz cookie	The __utmz cookie monitors the HTTP Referrer and notes where a visitor arrived from, with the referrer siloed into type (Search engine (organic or cpc), direct, social and unaccounted). From the HTTP Referrer the __utmz Cookie also registers what keyword generated the visit plus geolocation data. This cookie lasts six months. In tracking terms this Cookie is perhaps the most important as it will tells the site owner about traffic to the site and helps with conversion information such as what source / medium / keyword to attribute for a Goal Conversion.
Expression Engine CMS:	ExpressionEngine CMS uses these cookies to track a user’s session, when they last visited or did something on the site. No personal information is stored in these cookies, only timestamps related to that browser session, plus a token to prevent Cross Site Request Forgery attacks.
1. exp_csrf_token	Expires after 2 hours.
2. exp_last_activity, exp_last_visit, exp_tracker	Expire when the session ends.
3. PHPSESSIDT	This site runs on the PHP, and uses a cookie to track the user’s session to ensure a consistent experience throughout the site.

- 4.2 At present, Haig does not place any third party Cookies on your computer or

device.

- 4.3 Our Site uses analytics services provided by Google Analytics. These first party cookies are set via a piece of code which is added to every page that site owners want to track. It sets four cookies automatically, and a fifth via opt-in (this relates to sharing information about your traffic with Google).

Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

5. Consent and Control

- 5.1 Before Cookies are placed on your computer or device, you will be shown a pop-up or similar warning requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 5.2 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 5.3 The links below provide instructions on how to control Cookies in all mainstream browsers:
 - 5.3.1 Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en-GB>
 - 5.3.2 Microsoft Internet Explorer: <https://support.microsoft.com/en-us/kb/278835>
 - 5.3.3 Microsoft Edge: <https://support.microsoft.com/en-gb/products/microsoft-edge> (Please note that there are no specific instructions at this time, but Microsoft support will be able to assist)
 - 5.3.4 Safari (macOS): https://support.apple.com/kb/PH21411?viewlocale=en_GB&locale=en_GB
 - 5.3.5 Safari (iOS): <https://support.apple.com/en-gb/HT201265>
 - 5.3.6 Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-Cookies-website-preferences>
 - 5.3.7 Android: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=en> (Please refer to your device's documentation for manufacturers' own browsers)

6. **Changes to this Cookie Policy**

- 6.1 We may alter this Cookie Policy at any time. If we do so, details of the changes will be highlighted at the top of this page. Any such changes will become binding on you on your first use of our Site after the changes have been made. You are therefore advised to check this page from time to time.
- 6.2 In the event of any conflict between the current version of this Cookie Policy and any previous version(s), the provisions current and in effect shall prevail unless it is expressly stated otherwise.

7. **Further Information**

- 7.1 If you would like to know more about how we use Cookies, please contact us at communications@haighousing.org.uk, by telephone on 020 8685 5777 or by post at Alban Dobson House, Green Lane, Morden SM4 5NS.
- 7.2 For more information about privacy, data protection and our terms and conditions, please visit the following:
 - 7.2.1 Privacy Policy: <http://www.haighousing.org.uk/privacy-policy>
 - 7.2.2 Terms and Conditions: <http://www.haighousing.org.uk/terms-and-conditions>