

# COOKIE POLICY



Organisation: TPTracker Ltd

Version: V1.0

Last Updated: 26<sup>th</sup> January 2026

## 1. Introduction

This Cookie Policy explains how TPTracker Ltd ("we", "us", or "our") uses cookies and similar technologies on our website in accordance with:

- the UK General Data Protection Regulation (UK GDPR)
- the Data Protection Act 2018 (DPA 2018)
- the Privacy and Electronic Communications Regulations 2003 (as amended) (PECR)
- the Data Use and Access Act 2025 (DUAA 2025)

We take your privacy seriously and aim to ensure full transparency and fairness in how your data is managed.

## 2. What Are Cookies?

Cookies are small text files placed on your device when you visit our website. They help us understand how the site is being used, improve your experience, and (with your consent) support analytics and marketing functions. Some cookies are strictly necessary for our website to work. Others are only used with your prior consent.

## 3. Types of Cookies We Use

We may use the following categories of cookies:

- **Strictly Necessary Cookies:** These are essential to enable basic functions such as page navigation, security, and accessibility. These cannot be switched off.
- **Analytics Cookies:** These help us understand how visitors use our site, allowing us to improve performance and user experience (e.g. Google Analytics). These are only used with your consent.
- **Functional Cookies:** These remember choices and settings that improve your experience, for example language, region, accessibility preferences, and items saved during a session. Where a cookie is strictly necessary to deliver a service you have requested, it will be treated as essential. All other functional cookies are non-essential and will only be set if you opt in through the banner or the Manage Cookies settings.

- **Marketing Cookies:** These are used to deliver relevant advertising and track the effectiveness of our campaigns (e.g. Facebook Pixel). These also require your explicit opt-in consent.

#### 4. Consent and Cookie Controls

On your first visit, you will be shown a cookie banner that gives you the choice to:

- Accept all cookies
- Reject non-essential cookies
- Customise your cookie preferences

Accept and Reject options are presented with equal prominence. You are invited to opt in to any category beyond strictly necessary. Cookies are not set until your consent is obtained, and we do not rely on pre-ticked boxes, passive consent, or ambiguous wording.

Our design avoids any nudge tactics or “dark patterns” in line with ICO guidance and DUAA 2025 duties placed upon senior management.

You can change your cookie preferences at any time by clicking the “Manage Cookies” link in our website footer.

#### 5. Third-Party Cookies

Some cookies used on our site are placed by third-party services (such as Google Analytics or Meta Pixel) to support analytics, surveys, or marketing. These cookies are not activated unless and until you give your explicit consent. We control whether third-party cookies are enabled on our website and take responsibility for providing clear information about their use in this policy.

#### 6. Retention of Consent Records

We keep a secure record of your cookie consent status in accordance with the UK GDPR’s accountability principle and DUAA 2025 obligations. This allows us to demonstrate when, how, and on what basis consent was given or withdrawn. Consent records are retained for up to six years to support regulatory accountability and complaint handling, in line with our internal retention documentation, and are refreshed periodically to ensure that your choices remain valid and up to date.

## 7. Individual Cookie Details

Because cookies and trackers may vary depending on browser settings, plug-ins, and updates, we do not list each individual cookie here. However, we are happy to provide a current list on request.

This approach reflects the dynamic nature of cookies and ensures that information provided is accurate at the time of request, avoiding the publication of information that may become misleading due to routine technical changes.

To request a full breakdown of cookies currently in use, please contact us at: [support@tptracker.com](mailto:support@tptracker.com)

## 8. Keeping This Policy Updated

We regularly review our use of cookies to make sure this policy stays accurate and up to date. Reviews take place at least once a year and whenever we add or change website tools or third-party services. Each review is recorded and overseen by our Accountable Person under the Data Use and Access Act 2025. Any changes are reflected in the “Last Updated” date below.

## 9. Contact Us

If you have questions about our use of cookies or how we handle your personal data, please refer to our Privacy Policy or email us at [support@tptracker.com](mailto:support@tptracker.com)

### Changes to this policy

We will update this notice whenever our processing changes. The latest version will always be published here, with the effective date shown at the top.