# Aceso Pathway Limited

# Cookie Policy

### 1. Who we are

Aceso Pathway Limited ("Aceso", "we", "us" or "our") is a company registered in England and Wales.

**Registered office:** Chapel House, Leicester Road, Loughborough, England, LE11 2AF
**Company number:** 16251254
**Telephone:** +44 (0)1509 972221
**Email:** contact@acesopathway.co.uk
**Website:** https://acesopathway.co.uk
**CQC registration number:** 1-25880912014

Aceso Pathway Limited is responsible for determining how and why personal information is processed through its website, where it acts as the data controller.

This policy explains how cookies and similar technologies may be used on our website, the purposes for which they are used, and how visitors can manage their preferences.

### 2. Scope and related privacy information

This policy applies to visitors who access or use https://acesopathway.co.uk, including those who visit our information pages or use our contact form.

It should be read alongside our Privacy Policy.

Our Privacy Policy explains how we collect, use, disclose, store and protect personal information, including information submitted through our contact form, the service providers involved in processing that information, international transfers, retention arrangements and your data protection rights.

This Cookie Policy focuses specifically on cookies and similar technologies used on the website.

## 3. What are cookies and similar technologies?

Cookies are small text files that a website may store on your computer, smartphone or other device. They can help websites operate, maintain security, remember preferences and understand how visitors use their pages.

Similar technologies can include tracking pixels, scripts, tags, browser storage and other methods of storing information on, or accessing information from, a user's device.

These technologies may be used by us directly or by third-party service providers whose services are integrated into our website.

Cookies may be:

- **Session cookies:** normally deleted when you close your browser.
- **Persistent cookies:** remain on your device for a defined period or until you delete them.
- **First-party cookies:** set by the website you are visiting.
- **Third-party cookies:** set by a third party whose technology or service is used on the website.

Not every script or third-party integration necessarily sets a cookie. The applicable requirements depend on what the technology actually does, including whether it stores information on or accesses information from your device.

## 4. Technologies used on our website

Our website is built and hosted using GoDaddy. We use Google Analytics for website traffic analysis and Google reCAPTCHA to help protect our contact form against spam and abuse.

### 4.1 GoDaddy website services

GoDaddy provides our website-building, hosting and contact-form services.

Information may be processed through these services to display website pages, process enquiries, maintain website functionality and security, and support the operation of the website.

GoDaddy also retains copies of contact-form enquiries in its Conversations inbox, as explained in our Privacy Policy.

GoDaddy or technologies integrated into its services may use cookies or similar technologies. The specific technologies, their purposes and their retention periods

must be determined from the website's actual configuration and the relevant provider information.

We do not assume that every technology available through GoDaddy is necessarily active on our website.

### 4.2 Google Analytics

Our website includes a Google Analytics tag to help us analyse website traffic and understand how visitors interact with our pages.

Depending on its configuration, Google Analytics may process technical and usage information, such as page views, browser or device information, referral information and website interaction data. It may use cookies or other technologies to collect or access such information.

The exact data collected, cookies set, retention periods and operation of the tag depend on the configuration deployed on our website.

We will use Google Analytics in accordance with applicable privacy and electronic communications law.

Where consent is legally required, the relevant technology will not be used before valid consent is obtained. Where we rely on a statutory exception, we will ensure that the conditions for that exception are satisfied, provide the required information and offer an appropriate means of objecting where required.

Our website's consent mechanism and the actual behaviour of the Google Analytics tag must be consistent with this policy.

### 4.3 Google reCAPTCHA

Our website contact form uses Google's invisible reCAPTCHA technology to help detect and prevent spam, automated submissions and abuse.

This service may process technical information and use cookies or similar technologies to assess whether a form submission is genuine and to protect the website.

The precise information processed and the technologies used depend on the deployed integration and Google's applicable service terms and privacy documentation.

We will assess the applicable legal requirements for the technology as implemented, including whether it is exempt from consent or requires consent in particular

circumstances. Its security purpose does not, by itself, establish that every use of the technology is exempt.

Further information about Google's services is available at:

https://policies.google.com/privacy

https://policies.google.com/terms

The applicable Google reCAPTCHA service terms and data-processing documentation should also be consulted for the deployed integration.

### 5. Cookie categories and legal requirements

We distinguish between technologies according to their actual purpose and the legal requirements that apply.

### 5.1 Strictly necessary technologies

Some technologies may be necessary to provide a service requested by a visitor, maintain essential website functionality or support security.

Where a technology meets the applicable statutory exception, consent may not be required. We will provide any information and controls required by law.

A technology will not be treated as strictly necessary merely because it is convenient for us or is supplied as part of a website platform.

### 5.2 Analytics and statistical technologies

Analytics technologies may help us understand website traffic, page performance and visitor interactions so that we can improve the website.

Under the applicable UK rules, certain uses of storage and access technologies solely for qualifying statistical purposes may fall within a statutory exception to the consent requirement. That exception is conditional and does not cover all analytics configurations.

Where we rely on an applicable exception, we will provide clear and comprehensive information and a simple, free means of objecting, as required by law.

Where the exception does not apply, we will obtain valid consent before using the relevant technology.

### 5.3 Other third-party technologies

Other technologies may be introduced or activated if we add functionality to the website.

Before introducing material new tracking technologies or purposes, we will assess their operation, legal requirements, data protection implications and the information that must be provided to visitors.

Technologies requiring consent will not be activated before that consent is obtained.

## 6. Cookie consent and managing preferences

Our website provides Accept and Decline choices through its cookie banner.

Where consent is required, visitors must be able to make a genuine choice about non-essential technologies. A general acceptance of this policy or simply continuing to browse the website does not, by itself, constitute valid consent.

Where consent is required:

- We will obtain consent before the relevant technology is activated.
- Visitors will be given clear information about the purposes for which the technology is used.
- Refusing non-essential technologies will not be made unnecessarily difficult compared with accepting them.
- Consent will be recorded and managed appropriately.
- Visitors will be able to withdraw consent as easily as they gave it.

Where a statutory exception applies instead of consent, we will provide the information and objection mechanism required for that exception.

Visitors can change or withdraw their preferences using the cookie settings available on our website, where provided. We will maintain an accessible means of reopening those settings.

Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

## 7. Information about individual cookies

The specific cookies and similar technologies used on our website may vary according to the website configuration, visitor choices, browser and third-party services.

We will maintain an accurate cookie inventory based on a technical review of the live website. Where applicable, that inventory will identify:

- the cookie or technology name;
- the provider responsible for it;
- its purpose and category;
- whether it is first-party or third-party;
- its duration or retention period; and
- whether consent is required or a specific statutory exception applies.

The inventory will be made available through our cookie information or preference mechanism.

We will not publish unverified cookie names, durations or claims about third-party technologies.

## 8. How to manage cookies through your browser

You can also manage or delete cookies through your browser settings. Most modern browsers allow users to review, block or delete some or all cookies.

The available controls vary depending on your browser and device. Blocking cookies may affect some website functions.

Browser settings do not necessarily provide a complete means of controlling every technology used by our website. Where the law requires a website-level consent or objection mechanism, browser settings alone will not replace that requirement.

## 9. Personal information and third-party providers

Information collected through cookies or similar technologies may constitute personal data where it relates to an identified or identifiable individual.

Where personal data is processed, we will comply with applicable data protection law, including the UK GDPR and Data Protection Act 2018.

Our Privacy Policy explains our approach to personal information, including the purposes and lawful bases of processing, relevant service providers, international transfers, retention arrangements and individual rights.

Third-party providers may process information in accordance with their applicable service terms and privacy documentation. We will provide appropriate information about relevant providers and consider the safeguards required for any processing or international transfers.

We do not sell personal information.

## 10. Sensitive health-related information

Aceso Pathway provides assessment and treatment services relating to PTSD, trauma and mental health.

We recognise that visitors may access our website while seeking information about sensitive personal matters. We will take this context into account when assessing the privacy risks of analytics and other tracking technologies.

We will not assume that a visitor's use of a particular webpage gives us permission to infer their health status or use their browsing activity for unrelated purposes.

Where a technology may process personal data, we will assess the applicable data protection requirements and implement appropriate safeguards.

## 11. Changes to this policy

We may update this policy to reflect changes to our website, technology providers, processing activities or applicable law.

The current version will be published on our website. Where a change materially affects the purposes for which technologies are used or the choices available to visitors, we will take appropriate steps to provide updated information and obtain fresh consent where required.

We will review this policy at least annually and sooner following any material change to our website or tracking technologies.

## 12. Contact us

For questions about this Cookie Policy, cookies or similar technologies, or to raise a privacy concern, please contact:

**Aceso Pathway Limited**
For the attention of: Jamie Mackenzie, Data Protection Lead
Chapel House
Leicester Road
Loughborough
LE11 2AF
England

Email: contact@acesopathway.co.uk
Telephone: +44 (0)1509 972221

You may also consult our Privacy Policy at the Aceso Pathway Limited website for information about your personal data rights and how to exercise them.

## 13. Legal and regulatory framework

This policy is intended to support compliance with applicable UK privacy and data protection law, including:

- the Privacy and Electronic Communications Regulations 2003 (PECR), as amended;
- the UK General Data Protection Regulation;
- the Data Protection Act 2018; and
- relevant guidance issued by the Information Commissioner's Office.

We will interpret and apply these requirements according to the actual technologies deployed and the purposes for which they are used.