



Cookies Policy September 2024



1. Definitions and Abbreviations

Apogee Corporation Limited (Apogee) Data	Refers to Apogee Corporation Limited and all its subsidiaries and affiliates.
Data Breach	Any information which is stored or otherwise processed in any format by Apogee staff or automated systems.
Data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.
Data Controller (or controller)	The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
Data Processor (or processor)	A natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.
Data Protection Officer (DPO)	The named person within the business who is overall responsible for the oversight and implementation of GDPR and acts as a point of contact for the data subjects.
Data Protection Impact Assessment (DPIA)	A process to assess the impact of high-risk processing activities on individuals' privacy.
Data Subject	A natural person whose personal data is processed by Apogee.
Data Users	Employees whose work involves using personal data.
EEA	The European Economic Area, comprising the member states of the European Union plus Iceland, Liechtenstein, and Norway.
Encryption	The process of converting information or data into a code, especially to prevent unauthorised access.
International Data Transfer	The transfer of personal data to a country outside the UK or EEA.
General Data Protection Regulation (GDPR):	Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural

persons with regard to the processing of personal data and on the free movement of such data.

Legal Person	A legal entity or organisation
Natural Person	A human being, as opposed to a legal person.
Personal Data:	Any information relating to an identified or identifiable natural person ('data subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Pseudonymisation	The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.
Special Categories of Personal Data (or Sensitive Personal Data)	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, health data, or data concerning a natural person's sex life or sexual orientation.
Third Party	Any external organisation or individual that Apogee shares personal data with.
UK GDPR	The UK General Data Protection Regulation, which is the UK's implementation of the GDPR following its departure from the European Union.

2. Introduction

Cookies are small text files that are placed on your device when you visit a website. They play an important role in enhancing your browsing experience by enabling websites to remember your preferences, track your activity, and provide personalized content.

Apogee use cookies and similar technologies on our websites and applications to improve their functionality, analyse usage patterns, and deliver targeted advertising.

This Cookie Policy aims to provide you with clear and transparent information about the types of cookies we use, their purposes, and how you can manage or control them. By understanding our cookie practices, you can make informed choices about your online privacy.

3. What are Cookies?

3.1. Definition

Cookies are small text files that are stored on your computer or mobile device when you visit a website. They contain information about your browsing activity and preferences, which can be accessed by the website on subsequent visits.

3.2. Types of Cookies

There are several types of cookies, categorized based on their duration and origin:

- **Session Cookies:** These are temporary cookies that are stored in your browser's memory only for the duration of your visit to the website. They are deleted when you close your browser.
- **Persistent Cookies:** These cookies remain on your device for a set period, even after you close your browser. They are used to remember your preferences and settings for future visits.
- **First-Party Cookies:** These are cookies set by the website you are visiting directly.
- **Third-Party Cookies:** These are cookies set by a domain other than the one you are visiting. They are often used for advertising and analytics purposes.

3.3. How Cookies Work

When you visit a website, the website sends a cookie to your browser. Your browser then stores the cookie on your device. On subsequent visits to the same website, your browser sends the cookie back to the website, allowing it to recognize you and remember your preferences or previous actions.

4. Types of Cookies We Use

We utilise various types of cookies on our websites and applications, each serving a specific purpose to enhance your browsing experience and enable us to provide our services effectively.

4.1. Strictly Necessary Cookies

These cookies are essential for the basic functioning of our websites and applications. They enable core features such as secure login, navigation, and form submission. Without these cookies, certain parts of our websites would not work properly.

Examples:

- Session cookies to maintain your login session.
- Cookies to remember items in your shopping cart.
- Cookies to prevent cross-site request forgery (CSRF) attacks.

4.2. Performance Cookies

These cookies help us understand how visitors interact with our websites by collecting anonymous information about usage patterns. This data allows us to analyse website performance, identify areas for improvement, and optimize the user experience.

Examples:

- Google Analytics cookies to track website traffic and usage statistics.
- Cookies to measure the effectiveness of our marketing campaigns.
- Cookies to monitor website load times and identify performance bottlenecks.

4.3. Functionality Cookies

These cookies enable us to remember your choices and preferences, providing a more personalised experience on our websites. They may also be used to enable enhanced features and functionality.

Examples:

- Cookies to remember your language preferences.
- Cookies to store your login details for easier access.
- Cookies to enable video content or interactive features.

4.4. Targeting/Advertising Cookies

These cookies are used to deliver advertisements that are more relevant to your interests. They may also be used to limit the number of times you see an ad and measure the effectiveness of advertising campaigns. These cookies are typically placed by third-party advertising networks with our permission.

Examples:

- Cookies used by advertising networks to track your browsing activity across different websites and build a profile of your interests.

- Cookies to deliver targeted ads based on your previous interactions with our websites or products.
- Cookies to measure the performance of our advertising campaigns.

5. Managing Cookies

You have the right to choose whether or not to accept cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to:

- **Decline cookies:** You can set your browser to reject all or certain types of cookies.
- **Delete cookies:** You can delete existing cookies from your browser.
- **Receive notifications:** You can set your browser to notify you when a website attempts to set a cookie.

Please note that blocking or deleting cookies may impact your ability to use certain features or functionalities on our websites.

5.1. How to Manage Cookies in Popular Browsers

- **Microsoft Edge:** <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>
- **Chrome:** <https://support.google.com/chrome/answer/95647?hl=en-GB>
- **Firefox:** <https://support.mozilla.org/en-US/kb/delete-browsing-search-download-history-firefox>
- **Safari:**
 - **Mobile devices:** <https://support.apple.com/en-gb/HT201265>
 - **Desktops:** <https://support.apple.com/en-gb/guide/safari/sfri11471/mac>
- **Other Browsers:** For other browsers, please consult the help documentation provided by your browser developer.

5.2. Cookie Management Tools and Opt-Out Mechanisms

- **[If applicable]** Apogee Cookie Consent Tool: We may provide a cookie consent tool on our websites that allows you to manage your cookie preferences directly.
- **Third-Party Opt-Out:** Some third-party cookies used on our websites, such as those for advertising or analytics, may offer their own opt-out mechanisms. Please refer to the privacy policies of these third parties for more information.

6. Third-Party Cookies

In addition to the cookies, we set directly, our websites and applications may also use cookies from third-party service providers. These cookies are typically used for analytics, advertising, or social media integration purposes.

6.1. Types of Third-Party Cookies and Their Purposes

- **Analytics Cookies:** These cookies help us understand how visitors use our websites by collecting anonymous information about their browsing behaviour. This information helps us improve our websites and tailor content to user needs.

- **Advertising Cookies:** These cookies are used to deliver advertisements that are more relevant to your interests. They may also be used to limit the number of times you see an ad and measure the effectiveness of advertising campaigns.
- **Social Media Cookies:** These cookies allow you to share content from our websites on social media platforms or interact with social media features embedded on our sites.

6.2. Third-Party Privacy Policies

For more detailed information on the specific third-party cookies we use and their privacy practices, please refer to the privacy policies of the relevant third parties:

- [List of third-party providers and links to their privacy policies]

7. Changes to this Cookie Policy

We may update this Cookie Policy from time to time to reflect changes in our use of cookies or applicable laws and regulations. Any changes we make will be posted on this page, and the revised policy will include an updated effective date.

For significant changes that may materially affect how we use cookies or your privacy, we will make reasonable efforts to notify you, such as through prominent notices on our website or via email (if you have provided us with your email address).

We encourage you to review this Cookie Policy periodically to stay informed about our cookie practices.

8. Contact Us

If you have any questions, concerns, or requests regarding this Cookies Policy, your personal data, or your data protection rights, please contact our Data Protection Officer (DPO) and Head of Legal, Robert Marr, using the following details:

- **Email:** legal@apogeeecorp.com
- **Postal Address:** Nimbus House, Liphook Way, Maidstone, Kent, ME16 0FZ, UK

We are committed to addressing your inquiries and concerns promptly and effectively. Please do not hesitate to contact us if you have any questions or concerns about this Privacy Policy or how we handle your personal data.

Document Control

DOCUMENT NAME	VERSION	MASTER COPY LOCATION
Cookies Policy	1	Compliance SharePoint

Unless stated within the body of this document, the owner is responsible for maintaining document control and facilitating compliance, as well as the management of review, updates and changes.

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REVISION HISTORY

Version	Date	Amended By	Summary of changes
1	2024-09-27	Keith Harvey	New Baseline Policy

DOCUMENT REVIEWS

This document has been reviewed for QC purposes by the following, in addition to those on the 'approvers' list.

Version	Date	Name	Title / Role
1		Robert Marr	DPO/Head of Legal
1		Simon Green	Chief Information Officer
1		Samantha Jackson	Chief Finance Officer
1		Marion Brooks	Chief People Officer

APPROVALS

This document requires the following approvals for implementation and / or for any change in content.

Version	Date	Name	Title / Role	Approval Status (Pending/Approved)
1		Simon Green	Chief Information Officer	Pending

