

Cookie Policy

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1 Introduction

1.1 Policy statement

The purpose of this policy is to outline considerations for the use of cookies in relation to visitors to The Mills sister website, The Mill Medical Portal. This policy will further detail what cookies are and how to maintain compliance with the [Privacy and Electronic Communications Regulations \(PECR\) EC Directives 2003](#).

1.2 Status

The organisation aims to design and implement policies and procedures that meet the diverse needs of our service and workforce, ensuring that none are placed at a disadvantage over others, in accordance with the [Equality Act 2010](#). Consideration has been given to the impact this policy might have regarding the individual protected characteristics of those to whom it applies.

This document and any procedures contained within it are non-contractual and may be modified or withdrawn at any time. For the avoidance of doubt, it does not form part of your contract of employment. Furthermore, this document applies to all employees of the organisation and other individuals performing functions in relation to the organisation such as agency workers, locums and contractors.

2 Understanding cookies

2.1 What are cookies?

The [Information Commissioner's Office](#) (ICO) explain that cookies are small files of letters and numbers that are downloaded onto the user's computer when they visit a website. Cookies can help to remember the user's preferences, record what they have added to their shopping basket and are also used to count the number of people looking at a website.

This organisation has a responsibility to provide clear and comprehensive information about how it uses cookies.

2.2 Are cookies safe?

All users should be reassured that cookies on this organisation's website, as for others, will not cause any harm to a device nor do they identify who the user is or divulge any personal details about the user. The data they help to collect is anonymous. At this organisation, we do not use cookies to collect any data that could be used to personally identify any user.

2.3 How are cookies turned off?

Most modern browsers will offer different ways to configure how cookies are managed and this can vary from only allowing cookies from websites that a user

trusts to the user blocking all cookies by default. Steps for controlling a user's settings can vary for each browser. The following links are the official instructions for the most common browsers:

- [Google Chrome](#)
- [Mozilla Firefox](#)
- [Apple Safari](#)
- [Internet Explorer](#)
- [iOS Safari](#)
- [Google Android](#)

For more advice on managing cookies, refer to the [All About Cookies](#) website.

3 Types of cookies

Detailed information about the specific types of cookies is provided by [About Cookies - Cookie types](#) with further information available from [Age UK - Cookies](#).

4 Legislation

4.1 Legal requirement

The overarching legislation is the [Privacy and Electronic Communications Regulations \(PECR\) EC Directives 2003](#). This covers the use of cookies for accessing and storing information on a user's equipment or mobile device.

Further detailed information can be found in the following resources:

- [Guidance on the use of cookies and similar technologies](#)
- [How do the cookie rules relate to the GDPR?](#)

5 Compliance

5.1 Organisation requirement

This organisation will adhere to the [ICO guidance](#) to ensure compliance with the PECR Directives which includes the following:

- [Location and format of the cookie policy](#) (this is located [at the bottom of The MillMedical Portal Website)
 - [Consent](#) including settings-led and feature-led consent
 - [Children and cookies](#)
 - [Analytics](#)
 - [Third party cookies](#)
 - [Exemptions](#)
 - [Withdrawal of consent](#)
 - [Frequency of consent](#)
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5.2 Opting out

Most web browsers automatically accept cookies.

The user can decline to accept cookies and/or choose at any time to reject, block or delete cookies that are currently stored on their device. Users can find out how to do this for their particular browser by clicking “help” on the browser’s menu or by visiting: www.allaboutcookies.org.

Details on how to opt out can be sought for both [Windows](#) or [iOS](#) products although the user should be advised that, should they choose to block cookies, they may not be able to access certain features of the organisation’s website.

For mobile phones, information on how to reject or delete cookies on the browser can be sought in the user device manual.

5.3 Duration of cookie on device

The duration of the cookie will depend on the purpose of it. This organisation ensures that the use of cookies is both limited to what is necessary to achieve the purpose and proportionate in relation to the intended outcome

5.4 Cookie audit

This organisation will conduct a cookie audit as detailed in the [ICO guidance](#). Re-audit is essential and will be conducted annually.

5.5 Social media platforms

As this organisation uses social media platforms, it should be noted those platforms will also set cookies on users’ devices once they visit those pages. This organisation will ensure that the privacy notice on the website includes references to our social media sites and how individuals are able to control the setting of any non-essential cookies once they visit that site.

5.6 Non-compliance

In cases where organisations refuse or fail to comply voluntarily, the ICO has a range of options available for taking formal action when this is necessary. For further detailed information, see the [ICO Regulatory Action Policy](#).

While the UK GDPR gives the ICO enhanced powers, the enforcement regime for PECR remains that which was in effect under the previous Data Protection Act, that is, except when personal data is processed.

When formal action is considered, for example, an organisation refuses to take steps to comply, or has been involved in a particularly privacy-intrusive use of cookies without advising the user or obtaining any consent, the use of formal regulatory powers would be considered in accordance with [ICO Regulatory Action Policy](#).