

Cookie Policy Template

VERSION 1.0 • CLASSIFICATION: PUBLIC
APPLICABLE TO: WEBSITES • CLIENT PORTALS • WEB APPLICATIONS • SAAS PLATFORMS

MUCHANGI PATRICK & ASSOCIATES ADVOCATES
Data Privacy • AI Governance • Digital Regulation

DOCUMENT CONTROL

ITEM	DETAILS
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CONTENTS

1. Introduction
2. What Are Cookies?
3. Why We Use Cookies
4. Categories of Cookies
5. Cookies We Use
6. Third-Party Cookies
7. Analytics Technologies
8. Advertising Technologies
9. AI and Personalisation Technologies
10. Managing Cookies
11. Browser Controls
12. Withdrawal of Consent
13. Consequences of Disabling Cookies
14. Data Protection
15. Changes to this Policy
16. Contact Information

1. INTRODUCTION

This Cookie Policy explains how [Organisation Name] (“we”, “us”, “our”) uses cookies and similar technologies when you access or interact with our website or online services.

Where cookies involve the processing of personal data, such processing is carried out in accordance with our Privacy Policy and applicable data protection law, including the Data Protection Act, 2019.

2. WHAT ARE COOKIES?

Cookies are small text files placed on your device when you visit a website. They enable websites to:

- Recognise your device
- Remember your preferences
- Maintain secure sessions
- Improve functionality
- Analyse website performance
- Enhance user experience

3. WHY WE USE COOKIES

We use cookies to:

- Operate the website
- Authenticate users
- Maintain security
- Remember user preferences
- Improve website performance
- Understand visitor behaviour
- Detect fraud and abuse
- Measure website usage
- Improve accessibility
- Enhance user experience

4. CATEGORIES OF COOKIES

A. *Strictly Necessary Cookies*

These cookies are essential for the operation of the website and cannot ordinarily be disabled without affecting core functionality. Examples include:

- Session authentication
- Security tokens
- Load balancing

- Fraud prevention

B. Functional Cookies

These cookies remember:

- Language selection
- Accessibility settings
- Dashboard preferences
- Login preferences

C. Analytics Cookies

These cookies are used to understand page visits, visitor numbers, bounce rates, navigation patterns and website performance. Example providers include Google Analytics, Microsoft Clarity, Matomo and Plausible.

D. Performance Cookies

These cookies help identify slow pages, application errors, server performance issues and user experience issues.

E. Marketing Cookies

Where applicable, these cookies are used to measure advertising effectiveness, deliver relevant advertising, prevent repetitive advertisements and measure campaign performance.

F. Preference Cookies

These cookies store display settings, saved preferences, theme selection and dashboard customisation.

5. COOKIES WE USE

The table below sets out the cookies currently used on our website. This table must be reviewed and updated to reflect the Organisation's actual implementation before publication.

COOKIE NAME	PURPOSE	CATEGORY	DURATION	PROVIDER
SESSIONID	Authentication	Necessary	Session	Organisation
csrf_token	Security	Necessary	Session	Organisation
_ga	Analytics	Analytics	2 Years	Google
_gid	Analytics	Analytics	24 Hours	Google
language	Preferences	Functional	12 Months	Organisation

6. THIRD-PARTY COOKIES

Our website may use cookies placed by trusted third-party service providers, such as analytics providers, payment processors, video hosting services, embedded maps, customer support platforms and social media integrations. These providers process information under their own privacy practices, and we encourage you to review their respective policies.

7. ANALYTICS TECHNOLOGIES

We use analytics tools to understand visitor behaviour, page popularity, navigation paths, device information, website performance and areas for service improvement. Analytics data is used in aggregated or pseudonymised form where feasible.

8. ADVERTISING TECHNOLOGIES

[Where applicable:] Advertising technologies deployed on our website may measure campaign effectiveness, personalise advertisements, limit repeated advertisements and help us understand user engagement. Where required by law or organisational policy, these technologies are only activated after obtaining your consent.

9. AI AND PERSONALISATION TECHNOLOGIES

Where our website uses AI-driven features or recommendation systems:

- Cookies and similar technologies may be used to improve functionality and user experience;
- Personalisation does not produce legal or similarly significant effects on you without appropriate safeguards;
- You will be informed where AI-assisted profiling is used in a manner that materially affects you.

10. MANAGING COOKIES

You may:

- Accept all cookies
- Reject non-essential cookies
- Customise your cookie preferences through the website's consent management interface (where available)
- Change your preferences at any time

11. BROWSER CONTROLS

Most browsers allow you to delete cookies, block cookies, receive notifications before cookies are stored, and restrict cookies from particular websites. [Insert links or instructions for common browsers, e.g. Chrome, Firefox, Safari, Edge, where appropriate.]

12. WITHDRAWAL OF CONSENT

Where cookie processing is based on your consent, you may withdraw that consent at any time without affecting the lawfulness of processing carried out before withdrawal.

13. CONSEQUENCES OF DISABLING COOKIES

Disabling certain cookies may affect user authentication, website functionality, saved preferences, performance and personalised services.

14. DATA PROTECTION

Information collected through cookies that constitutes personal data is processed in accordance with:

- The Organisation's Privacy Policy
- Applicable data protection legislation
- Appropriate technical and organisational security measures

15. CHANGES TO THIS POLICY

We may update this Cookie Policy to reflect changes in technology, legal developments, new website features or operational requirements. Material changes will be communicated through the website where appropriate.

16. CONTACT INFORMATION

Organisation: *[Organisation Name]*

Physical Address: *[Insert Address]*

Email: *[Insert Email]*

Telephone: *[Insert Telephone]*

Website: *[Insert Website]*

Data Protection Officer / Privacy Contact: *[Insert DPO Name / Email]*

INTERNAL USE ONLY — NOT FOR CLIENT-FACING DISTRIBUTION**ANNEX A — COOKIE REGISTER (INTERNAL)**

This register should be maintained internally, listing every cookie deployed on the Organisation's website or web application. It should be reviewed whenever new technologies or third-party services are introduced.

COOKIE	CATEGORY	1ST / 3RD PARTY	PURPOSE	DURATION	PERSONAL DATA?	LEGAL BASIS	CONSENT REQUIRED?
[_____]	[_____]	[_____]	[_____]	[_____]	Yes / No	[_____]	Yes / No
[_____]	[_____]	[_____]	[_____]	[_____]	Yes / No	[_____]	Yes / No

ANNEX B — COOKIE COMPLIANCE CHECKLIST (INTERNAL)

Before deploying or updating the website, verify that:

- ☐ All cookies have been identified and documented.
- ☐ Cookies are categorised correctly.
- ☐ Non-essential cookies are not activated before any required consent is obtained.
- ☐ Third-party providers have been assessed for compliance.
- ☐ Cookie retention periods are documented.
- ☐ The Cookie Register (Annex A) is current.
- ☐ The Privacy Policy reflects cookie-related processing.
- ☐ Consent records (where used) are maintained and auditable.
- ☐ Periodic reviews are scheduled to remove obsolete cookies and assess new implementations.

PRACTICE NOTES — OPTIONAL MODULES

This template should be adapted with optional modules depending on the client's website and technology stack. A single core Cookie Policy can support everything from a simple brochure website to an AI-enabled legal platform by enabling the relevant modules below:

- Google Analytics 4 module
- Google Tag Manager module
- Meta Pixel module
- LinkedIn Insight Tag module
- Hotjar or Microsoft Clarity module
- Cloudflare Analytics module

- Live Chat module
- YouTube / Vimeo Embeds module
- E-commerce Tracking module
- AI Chatbot module
- Consent Management Platform module

Reference: Muchangi Patrick & Associates Advocates — Template Library. Annexes A and B and these Practice Notes must be removed before the Cookie Policy is published on a client's website.