



Cookie Management Roadmap: Business Guide

COOKIE MANAGEMENT

Cookie Primer

You probably hear people talk about cookies a lot — and we don't mean the tasty ones! We're talking about pieces of software that websites and apps place on devices to help them perform certain functions. Here are some different types of cookies that you may hear about as you navigate the world of privacy and data protection.



Essential Cookies

These are cookies that are essential to site functionality. These are the cookies that keep items in a shopping cart or remember login credentials.



Non-Essential Cookies

These are cookies like marketing cookies, preference cookies or analytics cookies. While they play an important role in the operation of a website and business, they are not considered essential.



First-Party Cookies

Cookies that are set and controlled by the owner of the website.



Third-Party Cookies

Cookies set by a third party, often an ad-tech or analytics provider contracted by the website owner. These third parties are often considered controllers of the personal information these cookies collect.



Session Cookies

Temporary cookies that are installed on a device and last only for the current session.



Persistent Cookies

These cookies last for an indeterminate amount of time and are not deleted at the end of a session. These allow websites to track individuals across sites and over time.



Cookies and Other Tracking Technologies

Cookies are not the only form of tracking technologies used by websites to collect information on visitors.

Tracking technologies also include pixels, beacons and fingerprinting, to name a few. From a data privacy perspective, more important than the kind of technology is what the technology does, who controls it and how it works.

COLLECTING PERSONAL INFORMATION

Cookies have the potential to collect personal information such as a unique ID, browsing history, website preferences, and more. Because of this, cookies can be used to identify a unique individual and are considered personal information under most data protection and privacy laws.

TRACKING AND PROFILING

Tracking cookies follow individuals as they browse the internet. These cookies collect lots of personal information about an individual's interests and behaviors over time and across websites, potentially uncovering sensitive information and allowing companies to make inferences and create profiles on individual consumers.

TRACKING INDIVIDUALS ACROSS DEVICES

Many companies use non-cookie trackers to identify an individual across all their devices. Using things like logins and information collected on opening emails and IP addresses, companies can connect an individual from their smartphone to their tablet to their laptop.

SHARING PERSONAL INFORMATION

Often, companies use third parties ad-tech platforms or networks to help them understand consumers and to serve them targeted ads. If these third parties can use the personal information the cookies collect to enrich their data sets or the data sets of others, this disclosure may be considered selling or sharing for cross-contextual advertising and be subject to notice and choice obligations.



CAUTION!

Make sure you know the full scope of the tracking technologies you use to ensure you're providing accurate notice and appropriate choices to individuals.



Create Long-Lasting Compliance

Managing your use of cookies and other tracking technologies takes diligent and sustained effort — keeping up with changes in laws, technologies, your website and your marketing efforts. Once you have a cookie program in place, it's important to test and iterate regularly (we recommend at least twice a year) to make sure things are working as you intended.



LAWS

Know what laws apply to you and your notice and choice obligations around cookies, targeted ads and profiling.



COOKIE SCAN

Perform a cookie scan on your website to know what cookies are running on it.



INVENTORY TRACKING TECH

For all tracking technology on your site, identify the owner, purpose, use and any sharing of information that may occur.



REVIEW CHOICE MECHANISMS

Ensure the consent and opt-out mechanisms you provide are effective, sufficient and in working order.



REVIEW NOTICES

Ensure your privacy notice and/or cookie notice accurately describes the cookies you use and the choices you provide to users.



CREATE COOKIE STANDARDS

Create and implement rules for the types of cookies allowed on your sites and vetting cookie providers.



ESTABLISH MAINTENANCE PROGRAM

Implement a cookie maintenance program including privacy impact assessments for new cookies, regular cookie audits, testing and updating choice mechanisms, and reviewing notices.











Create a Cookie Team

Managing cookies appropriately takes a cross-functional team.

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| <p>PRIVACY & LEGAL</p> <p>Know and operationalize your legal and contractual obligations.</p> | <p>MARKETING</p> <p>Know the marketing goals and objectives of the organization.</p> | <p>WEB DEVELOPMENT</p> <p>Ability to implement cookies and other technologies on your digital properties.</p> |
| <p>IT</p> <p>Ensure the security of the site and personal information.</p> | <p>AD AGENCY/3RD PARTY</p> <p>Need to ensure cookies are behaving as expected and according to contract.</p> | <p>TECH PARTNER</p> <p>Help to implement and maintain automation and choice mechanisms.</p> |

Choose a Cookie Management Technology

Ensure you're getting the right automation technology for your organization.

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|  <p>Ease of Use</p> <p>Easy for users and also integrates with your systems</p> |  <p>Banner Customization</p> <p>Language, functionality and branding</p> |  <p>Geo-location Settings</p> <p>Custom settings to align with consumers' regions</p> |  <p>Support for UOOM</p> <p>Recognizes browser preference settings</p> |
|  <p>Site Scanning & Reporting</p> <p>Capabilities for scanning your site and exporting results</p> |  <p>Categorization Tools</p> <p>Automated process for Identification and classification of cookies</p> |  <p>Cost & Pricing Model</p> <p>Subscription fees, implementation fees and ongoing support</p> |  <p>Support Services</p> <p>Availability, duration and quality of support</p> |

