

COOKIES POLICY

2025



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Effective Date:

Next Review Date:

Document Owner: Marketing
Department

Legal Framework: UK GDPR,
PECR 2003 (as amended)

1. Scope and Application

This Cookies Policy ("Policy") governs the use of cookies and similar tracking technologies by Baltic Training Services Ltd, trading as Baltic Apprenticeships ("Company", "we", "us", "our") across all our digital platforms and websites.

This Policy forms an integral part of our comprehensive Privacy Policy and Data Protection Framework. Users must read both documents to understand our complete approach to data collection, processing, and protection.

Legal Entity: Baltic Training Services Ltd

Trading Name: Baltic Apprenticeships

Registration: England and Wales

2. Definitions and Interpretation

"Cookies" means small text files containing alphanumeric identifiers that are stored on a user's device when accessing our websites, enabling recognition of that device on subsequent visits.

"Similar Technologies" includes web beacons, pixels, tags, local storage objects, and any other technologies that collect or store information on user devices or access information previously stored.

"Essential Cookies" means cookies that are strictly necessary for website functionality and security, exempted from consent requirements under PECR Regulation 6(4).

"Non-Essential Cookies" means all cookies requiring explicit user consent under PECR Regulation 6(1).

"Personal Data" has the meaning defined in Article 4(1) of UK GDPR.

"Data Subject" means any identified or identifiable natural person whose personal data is processed through our cookie usage.

3. Lawful Basis for Processing

Our cookie deployment operates under the following legal frameworks:

3.1 Essential Cookies

- **Legal Basis:** Legitimate interests (Article 6(1)(f) UK GDPR) and PECR Regulation 6(4) exemption
- **Purpose:** Website security, user authentication, load balancing, and core functionality
- **No Consent Required:** These cookies are deployed automatically

3.2 Non-Essential Cookies

- **Legal Basis:** Consent (Article 6(1)(a) UK GDPR) and PECR Regulation 6(1) compliance
- **Consent Standard:** Freely given, specific, informed, and unambiguous (Article 4(11) UK GDPR)
- **Withdrawal Rights:** Users may withdraw consent at any time without detriment

4. Cookie Categories and Deployment

4.1 Strictly Necessary Cookies

Purpose: Essential website operation and security

Legal Basis: Legitimate interests / PECR exemption

Retention: Session-based or until technical requirement ceases

Specific Deployments:

- Authentication and session management cookies
- Security and fraud prevention mechanisms
- Load balancing and server allocation cookies

- Essential accessibility feature cookies

4.2 Performance and Analytics Cookies

Purpose: Website performance optimization and user experience analysis

Legal Basis: User consent

Data Minimization: Analytics data anonymized where technically feasible

Third-Party Processors:

- **HubSpot Analytics:** Traffic analysis, conversion tracking, user journey mapping
- **WordPress Analytics Tools:** Basic performance metrics and error monitoring
- **Google Analytics:** Aggregated traffic reporting and demographic insights

Microsoft Clarity and Microsoft Advertising:

We partner with Microsoft Clarity to capture how users interact with our website through behavioural metrics, heatmaps, and session replay. This information helps us improve user experience, optimise site functionality, and support our marketing activities. Website usage data is captured using first-party and third-party cookies and other tracking technologies to analyse user engagement, measure product/service popularity, and understand online activity. Additionally, this data is processed for site optimisation, security, fraud prevention, and advertising purposes. For more information about how Microsoft collects and uses your data, visit the [Microsoft Privacy Statement](#).

4.3 Functionality Cookies

Purpose: Enhanced user experience through preference retention

Legal Basis: User consent

Retention: Maximum 12 months unless extended consent obtained

Functionality Includes:

- Language and regional preferences
- Accessibility settings and customizations

- Form auto-completion and saved preferences
- Personalized content delivery

4.4 Marketing and Targeting Cookies

Purpose: Advertising effectiveness measurement and personalized marketing delivery

Legal Basis: Explicit user consent with clear opt-out mechanisms

Third-Party Marketing Platforms:

- **HubSpot Marketing Hub:** Lead scoring, behavioural tracking, campaign attribution
- **Salesforce Marketing Cloud:** Customer journey orchestration and segmentation
- **LinkedIn Campaign Manager:** Professional audience targeting and conversion tracking
- **Meta Business Tools:** Social media advertising optimisation

5. Third-Party Data Processors

We engage the following third-party processors who may deploy cookies through our platforms:

Processor	Purpose	Data Location	Privacy Policy
HubSpot Inc.	CRM, Analytics, Marketing	European Union (Germany)	hubspot.com/privacy-policy
Salesforce Inc.	Customer Management	European Union	salesforce.com/privacy
Google LLC	Analytics, Advertising	USA (Adequacy Decision)	policies.google.com/privacy
LinkedIn Corporation	Professional Networking	USA (Adequacy Decision)	linkedin.com/privacy-policy
Microsoft Corporation	Behavioural Analytics	EU & USA	microsoft.com/privacy

Data Transfer Safeguards: All international transfers comply with UK GDPR Chapter V requirements through adequacy decisions or appropriate safeguards.

6. Data Subject Rights and Consent Management

6.1 Consent Management

Users can manage cookie preferences through:

- **Cookie Consent Manager:** Available on first visit and accessible via settings
- **Browser Controls:** Native browser cookie management tools
- **Account Settings:** Registered users can modify preferences in account dashboards

6.2 Rights Under UK GDPR

Data subjects have the following rights regarding cookie-collected data:

- **Right of Access (Article 15):** Request information about cookie data processing
- **Right of Rectification (Article 16):** Correct inaccurate personal data
- **Right of Erasure (Article 17):** Request deletion of personal data
- **Right to Restrict Processing (Article 18):** Limit processing activities
- **Right to Data Portability (Article 20):** Receive personal data in structured format
- **Right to Object (Article 21):** Object to processing based on legitimate interests

6.3 Consent Withdrawal

Consent can be withdrawn through:

- Cookie preference centre (accessible via website footer)
- Email request to dataprotection@balticapprenticeships.com
- Browser-based cookie deletion and blocking

7. Data Retention and Deletion

Cookie Retention Periods:

- **Session Cookies:** Deleted when browser session ends
- **Persistent Cookies:** Maximum 24 months unless legally required for longer retention
- **Analytics Data:** Anonymized data retained for maximum 38 months
- **Marketing Data:** Retained until consent withdrawal or 24 months, whichever occurs first

Automated Deletion: Our systems automatically purge expired cookies and associated personal data according to the above schedule.

8. Security Measures and Compliance

8.1 Technical Safeguards

- **Encryption:** All cookie data transmitted via HTTPS/TLS encryption
- **Access Controls:** Role-based access to cookie management systems
- **Regular Audits:** Quarterly technical and compliance audits
- **Vulnerability Management:** Continuous security monitoring and patching

8.2 Organizational Measures

- **Staff Training:** Regular data protection training for all personnel
- **Privacy by Design:** Cookie deployment reviewed during development
- **Data Protection Impact Assessments:** Conducted for high-risk cookie implementations
- **Incident Response:** Established procedures for potential data breaches

9. Browser Compatibility and Technical Requirements

Supported Browsers:

- Chrome 90+, Firefox 88+, Safari 14+, Edge 90+
- Mobile browsers: iOS Safari 14+, Android Chrome 90+

Technical Dependencies:

- JavaScript must be enabled for full cookie functionality
- Local storage support required for enhanced features
- Third-party cookies must be enabled for marketing features

10. Policy Updates and Version Control

10.1 Amendment Process

This Policy may be updated to reflect:

- Changes in applicable legislation or regulatory guidance
- Updates to our technical infrastructure or third-party services
- Recommendations from data protection authorities
- Results from privacy audits or impact assessments

10.2 Notification Requirements

Material changes will be communicated through:

- Prominent website notifications for 30 days
- Email notifications to registered users
- Updated consent requests where legally required

Version History: All previous versions maintained for regulatory compliance purposes.

11. Regulatory Compliance and Supervisory Authority

Primary Regulator: Information Commissioner's Office (ICO)

Registration Number: [Insert ICO Registration Number]

Compliance Framework: UK GDPR, PECR 2003, Data Protection Act 2018

Industry Standards: We adhere to relevant industry best practices including:

- IAB Europe Transparency and Consent Framework
- Digital Advertising Alliance guidelines
- ISO 27001 information security standards

12. Contact Information and Data Protection Officer

Data Protection Officer:

Email: dataprotection@balticapprenticeships.com

Post: Data Protection Officer, Baltic Apprenticeships, Pioneer House, Pioneer Court, Darlington, Co Durham, DL1 4WD, United Kingdom

Response Timeframes:

- General inquiries: 5 business days
- Data subject rights requests: 30 calendar days (as required by UK GDPR)
- Urgent privacy concerns: 24 hours

Office Hours: Monday-Friday, 9:00 AM - 5:00 PM GMT

Document Authority: This Policy is approved by the Baltic Apprenticeships Board of Directors and forms part of our comprehensive Data Protection Management System.

Legal Review: This document has been reviewed for legal compliance and regulatory adherence. For legal interpretation queries, contact our Data Protection Officer.

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