



SURKOVSKY CENTRE LTD

COOKIE POLICY

Cookies and Storage and Access Technologies Policy

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1. Introduction

Surkovsky Centre Ltd is committed to protecting the privacy of individuals who access and use its website, online services and other digital resources.

This Cookie Policy explains how the Company uses cookies and other storage and access technologies in connection with its website and online services.

Cookies and similar technologies may be used to support website functionality, maintain security, remember user preferences, understand how online services are used and, where applicable, support analytics, communications and other legitimate organisational activities.

Surkovsky Centre Ltd recognises that the use of these technologies may affect the privacy of users and shall therefore manage them transparently, responsibly and in accordance with applicable UK legislation.

Where the use of storage or access technologies involves the processing of personal data, such processing shall also be governed by the Company's Privacy Policy, Data Protection Policy and applicable UK data protection legislation.



2. Purpose

The purpose of this Policy is to establish a clear and transparent framework governing the use of cookies and other storage and access technologies by Surkovsky Centre Ltd.

This Policy aims to:

- explain what cookies and similar technologies are;
- explain why the Company may use such technologies;
- identify the principal categories of technologies that may be used;
- explain when consent may be required;
- provide users with appropriate control over non-exempt technologies;
- ensure transparency regarding third-party technologies;
- support compliance with applicable privacy and electronic communications legislation;
- protect the privacy and rights of website users;
- support responsible digital governance;
- ensure appropriate management of information obtained through online technologies.

The Company shall seek to use cookies and similar technologies only where they serve a legitimate, defined and proportionate purpose.

3. Scope

This Policy applies to the use of cookies and other storage and access technologies by or on behalf of Surkovsky Centre Ltd.

It applies to the Company's:

- websites;
- online platforms;
- digital services;
- web-based educational resources;
- research platforms;
- online registration systems;
- conference and event pages;
- online forms;
- other internet-based services operated or controlled by the Company.



This Policy applies to technologies used directly by Surkovsky Centre Ltd and, where applicable, technologies provided by authorised third-party service providers.

The Policy applies regardless of whether information accessed or stored through such technologies constitutes personal data.

Where personal data are processed, the requirements of applicable data protection legislation shall also apply.

4. Legal and Regulatory Framework

4.1 General Principle

Surkovsky Centre Ltd shall use cookies and other storage and access technologies in accordance with applicable UK privacy, electronic communications and data protection legislation.

The Company shall monitor relevant regulatory developments and shall update its practices where necessary.

4.2 Principal Legal Framework

This Policy shall be implemented with regard to applicable legislation, including:

- the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended (PECR);
- the UK General Data Protection Regulation (UK GDPR), where personal data are processed;
- the Data Protection Act 2018;
- applicable amendments introduced by subsequent UK legislation;
- other applicable privacy and electronic communications requirements.

4.3 Regulatory Guidance

The Company shall have regard, where appropriate, to guidance issued by the Information Commissioner's Office concerning cookies and other storage and access technologies.

The Company recognises that regulatory requirements may develop as technologies and legislation evolve.

4.4 Relationship with Data Protection Requirements

Where cookies or other storage and access technologies involve the processing of personal data, the Company shall also comply with applicable data protection principles and requirements.

These include, where applicable:



- lawfulness;
 - fairness;
 - transparency;
 - purpose limitation;
 - data minimisation;
 - accuracy;
 - storage limitation;
 - security;
 - accountability.
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5. Definitions

For the purposes of this Policy, the following definitions apply.

Cookie

A small piece of information stored on a user's device when the user accesses a website or online service.

Cookies may allow an online service to recognise a device, maintain a session, remember preferences or support other functions.

Storage and Access Technologies

Technologies that store information on, or access information stored on, a user's or subscriber's terminal equipment.

These may include:

- cookies;
 - tracking pixels;
 - web storage;
 - scripts;
 - tags;
 - device fingerprinting technologies;
 - link decoration and navigational tracking;
 - other comparable technologies.
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Terminal Equipment



Equipment used by a subscriber or user to access an electronic communications service or online service.

This may include:

- desktop computers;
- laptops;
- smartphones;
- tablets;
- other connected devices.

User

An individual who uses an online service or accesses the Company's website or digital resources.

Subscriber

A person who is a party to a contract with a provider of a public electronic communications service for the supply of that service.

First-Party Cookie

A cookie set by the website or online service that the user is directly visiting.

Third-Party Cookie

A cookie set or controlled by a third party in connection with the website or online service being accessed.

Session Cookie

A cookie designed to operate for the duration of a browsing session and normally removed when that session ends.

Persistent Cookie

A cookie that remains stored on a device beyond the current browsing session for a defined period or until it is deleted.

Consent



A freely given, specific, informed and unambiguous indication of an individual's wishes expressed through a clear affirmative action where consent is required by applicable law.

6. What Are Cookies

6.1 General

Cookies are technologies commonly used by websites and online services to store information on a user's device or retrieve information previously stored on that device.

Cookies may perform different functions depending upon their purpose and configuration.

6.2 Purposes of Cookies

Cookies may be used to:

- enable essential website functionality;
- maintain secure user sessions;
- remember user preferences;
- improve website usability;
- support authentication;
- maintain technical stability;
- understand website usage;
- measure website performance;
- support security and fraud prevention;
- provide functionality requested by users;
- support other legitimate digital activities.

The use of a particular cookie shall depend upon the functionality and services provided through the relevant online service.

6.3 Cookie Information

Depending upon their purpose, cookies may contain or generate information relating to:

- session identifiers;
- user preferences;
- technical settings;
- device information;
- browser information;



- interaction with website functions;
- pages or resources accessed;
- consent preferences.

The Company shall avoid collecting unnecessary information through cookies.

7. Storage and Access Technologies

7.1 General Principle

This Policy applies not only to traditional cookies but also to other technologies that store information on or access information from a user's terminal equipment.

Surkovsky Centre Ltd shall assess such technologies according to their function and purpose rather than solely according to their technical name or format.

7.2 Technologies Covered

Storage and access technologies may include:

- HTTP cookies;
 - HTML5 local storage;
 - session storage;
 - tracking pixels;
 - scripts;
 - tags;
 - device fingerprinting;
 - link decoration;
 - navigational tracking;
 - software development technologies performing comparable functions;
 - other technologies capable of storing or accessing information on terminal equipment.
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7.3 Technology-Neutral Approach

The Company recognises that privacy and electronic communications requirements may apply regardless of whether a particular technology is technically described as a cookie.

New technologies introduced by the Company shall therefore be assessed according to:

- whether information is stored on terminal equipment;
- whether information is accessed from terminal equipment;



- the purpose of the technology;
 - whether an applicable legal exception exists;
 - whether consent is required;
 - whether personal data are processed.
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8. Categories of Cookies

8.1 General Principle

Cookies and other storage and access technologies may be classified according to their purpose.

The categories used by Surkovsky Centre Ltd may include:

- strictly necessary technologies;
- functional technologies;
- preference technologies;
- analytics and measurement technologies;
- advertising and marketing technologies.

Not every category will necessarily be used on every Company website or online service.

8.2 Classification

The Company shall assess the actual purpose and operation of each technology before determining its category.

A technology shall not be classified as strictly necessary merely because it is useful, convenient or beneficial to the Company.

8.3 Transparency

Where appropriate, users shall be provided with information concerning:

- the name or type of technology;
- its purpose;
- whether it is provided by the Company or a third party;
- its duration where relevant;
- whether consent is required.

Such information may be provided through this Policy, a cookie management interface, a cookie table or another appropriate mechanism.



9. Strictly Necessary Cookies

9.1 General Principle

Strictly necessary cookies and comparable technologies are technologies required to provide an online service or functionality requested by the user, or otherwise falling within an applicable legal exception.

Such technologies may be used without prior consent where permitted by applicable legislation.

9.2 Examples

Depending upon the Company's online services, strictly necessary technologies may be used for purposes including:

- maintaining secure sessions;
 - providing authentication requested by a user;
 - maintaining essential website security;
 - supporting essential network functionality;
 - remembering information required to complete a user-requested transaction or process;
 - maintaining user choices necessary to operate a requested service;
 - recording or implementing cookie consent preferences where appropriate.
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9.3 Limitations

The strictly necessary classification shall be interpreted appropriately and shall not be applied merely because a technology:

- improves website performance;
- provides useful analytics;
- supports advertising;
- benefits the Company operationally;
- provides functionality that is not essential to the service requested by the user.

The Company shall periodically review technologies classified as strictly necessary.

10. Functional and Preference Technologies

10.1 Purpose

Functional and preference technologies may enable a website or online service to remember choices made by users and provide enhanced or personalised functionality.



These technologies may support:

- language preferences;
 - display preferences;
 - accessibility settings;
 - interface preferences;
 - previously selected options;
 - other user-requested customisation.
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10.2 Consent and Exceptions

The Company shall assess whether the relevant functional or preference technology falls within an applicable legal exception.

Where no applicable exception exists, the technology shall not be used until the required consent has been obtained.

10.3 User Control

Where consent is required, users shall be provided with an appropriate mechanism to accept or reject the relevant technologies.

Users shall also be able to change their preferences in accordance with applicable legal requirements.

11. Analytics and Measurement Technologies

11.1 General Principle

Surkovsky Centre Ltd may use analytics and measurement technologies to understand how users interact with its websites and online services and to support the improvement, security and effectiveness of those services.

The use of analytics and measurement technologies shall be proportionate to their purpose and shall comply with applicable legal requirements.

11.2 Purposes of Analytics

Analytics and measurement technologies may be used to:

- measure website traffic;
- understand how users navigate the website;
- identify frequently accessed pages and resources;



- assess website performance;
- identify technical problems;
- improve website structure and content;
- evaluate the effectiveness of online services;
- support security and fraud prevention;
- generate statistical information about website usage.

The Company shall seek to minimise the amount of information collected for analytics purposes.

11.3 Consent and Applicable Exceptions

Where analytics or measurement technologies require consent under applicable legislation, they shall not be activated before valid consent has been obtained.

Where an applicable statutory exception permits the use of particular technologies without consent, the Company shall ensure that all conditions associated with that exception are satisfied.

The availability of a legal exception shall be assessed according to the actual purpose, operation and configuration of the technology concerned.

11.4 Privacy-Preserving Analytics

Where reasonably practicable, the Company may adopt privacy-preserving approaches to website measurement.

Such measures may include:

- limiting the information collected;
 - reducing the use of persistent identifiers;
 - limiting retention periods;
 - restricting access to analytics information;
 - aggregating information;
 - anonymising information where appropriate;
 - configuring analytics services to reduce privacy risks.
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12. Advertising and Marketing Technologies

12.1 General Principle



Where Surkovsky Centre Ltd uses advertising, marketing or promotional technologies involving storage of or access to information on a user's device, such technologies shall be used transparently and in accordance with applicable legislation.

12.2 Purposes

Advertising or marketing technologies may, where applicable, be used to:

- measure the effectiveness of promotional communications;
 - understand interaction with campaigns;
 - support relevant communications;
 - measure referrals;
 - evaluate engagement with promotional content;
 - support legitimate marketing activities.
-

12.3 Consent

Where consent is required, advertising and marketing technologies shall not be activated unless and until the user has provided valid consent.

A user's refusal to consent to non-essential advertising or marketing technologies shall not prevent access to services that do not require those technologies.

12.4 Profiling and Personalisation

Where technologies are used for profiling or personalised advertising, the Company shall consider the additional privacy risks associated with such processing.

Where personal data are involved, processing shall also comply with the Company's Data Protection Policy and Privacy Policy.

13. First-Party and Third-Party Cookies

13.1 First-Party Cookies

First-party cookies are set or controlled by the website or online service that the user is directly accessing.

Surkovsky Centre Ltd may use first-party cookies for purposes including:

- essential website functionality;
- security;
- session management;



- user preferences;
 - consent management;
 - analytics where applicable.
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13.2 Third-Party Cookies

Third-party cookies or comparable technologies may be placed or operated by external service providers whose technologies are integrated into the Company's website or online services.

Third-party services may include, where applicable:

- website analytics providers;
 - video or multimedia services;
 - embedded content providers;
 - social media services;
 - security providers;
 - online communication services;
 - other authorised technology providers.
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13.3 Third-Party Responsibility

Where third-party technologies are used, the Company shall take reasonable steps to understand:

- the identity of the third party;
- the purpose of the technology;
- the information stored or accessed;
- the duration of the technology;
- whether information is shared with additional parties;
- whether consent is required;
- relevant privacy and security implications.

The Company's use of third-party technologies shall be periodically reviewed.

14. Session and Persistent Cookies

14.1 Session Cookies

Session cookies normally operate during a user's current browsing session.



They may be used to:

- maintain website functionality;
- maintain session information;
- support secure navigation;
- enable requested online processes.

Session cookies are normally deleted when the relevant browsing session ends, subject to the technical operation of the service concerned.

14.2 Persistent Cookies

Persistent cookies remain stored on a user's device beyond the current browsing session for a defined period or until deleted.

They may be used to:

- remember preferences;
 - recognise returning devices;
 - retain consent choices;
 - support permitted analytics;
 - provide continuing functionality.
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14.3 Duration

Persistent cookies shall not be retained for longer than reasonably necessary for their specified purpose.

The Company shall periodically review cookie durations and reduce retention periods where appropriate.

15. Legal Basis and PECR Requirements

15.1 General Principle

The use of cookies and other storage and access technologies shall be assessed primarily under applicable requirements governing the storage of information on, or access to information stored on, terminal equipment.

Where information obtained through those technologies constitutes personal data, applicable data protection requirements shall also apply.

15.2 Consent Requirement



Where no applicable legal exception applies, the Company shall obtain valid consent before storing information on or accessing information from a user's terminal equipment.

The relevant technology shall not be activated before the required consent has been obtained.

15.3 Legal Exceptions

Applicable legislation may permit certain storage and access activities without consent where the relevant statutory requirements are satisfied.

The Company shall assess each technology individually before relying upon an exception.

The existence of an operational or commercial benefit to the Company shall not, by itself, establish an exception from the consent requirement.

15.4 Relationship with UK Data Protection Law

Where the use of cookies or similar technologies results in the processing of personal data, Surkovsky Centre Ltd shall identify an appropriate lawful basis for that processing under applicable UK data protection legislation.

Compliance with data protection requirements does not remove any separate obligations arising under PECR.

16. Consent

16.1 General Principle

Where consent is required for the use of cookies or other storage and access technologies, Surkovsky Centre Ltd shall ensure that consent meets applicable legal standards.

Consent shall be:

- freely given;
 - specific;
 - informed;
 - unambiguous;
 - demonstrated through a clear affirmative action.
-

16.2 Prior Consent

Technologies requiring consent shall not be placed, activated or otherwise used before the user has made an appropriate affirmative choice.

Non-essential technologies shall remain inactive until the required consent has been obtained.



16.3 Information Before Consent

Before requesting consent, users shall receive appropriate information concerning the relevant technologies and their purposes.

Information shall be sufficiently clear to enable users to make an informed choice.

16.4 No Assumed Consent

The Company shall not treat the following, by themselves, as valid affirmative consent:

- silence;
- inactivity;
- continued browsing;
- failure to change browser settings;
- pre-selected options.

Consent mechanisms shall require an appropriate affirmative action where consent is legally required.

16.5 Granularity of Consent

Where appropriate, users shall be able to make meaningful choices concerning different categories or purposes of non-essential technologies.

The Company shall avoid combining unrelated purposes into a single consent choice where separate choices are required to provide genuine user control.

17. Cookie Consent Management

17.1 Consent Management Mechanism

Where non-essential technologies requiring consent are used, the Company shall provide an appropriate consent management mechanism.

This may include:

- a cookie banner;
 - a consent management platform;
 - a cookie preference centre;
 - another appropriate digital consent interface.
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17.2 User Choices

Where applicable, users shall be able to:

- accept relevant non-essential technologies;
- reject relevant non-essential technologies;
- select permitted categories;
- review their preferences;
- change their preferences;
- withdraw consent.

The design of consent controls shall support informed and genuine choice.

17.3 Equal Accessibility of Choices

Where consent is required, the Company shall seek to ensure that options to accept or reject non-essential technologies are presented in a clear and accessible manner.

Consent interfaces shall not be intentionally designed to mislead, pressure or manipulate users into accepting non-essential technologies.

17.4 Consent Records

Where appropriate, the Company shall maintain sufficient records to demonstrate that valid consent has been obtained.

Such records may include:

- the consent decision;
- date or time of the decision;
- categories or purposes selected;
- version of the consent information presented;
- relevant technical consent identifier.

Consent records shall themselves be managed in accordance with applicable data protection requirements.

18. Withdrawal and Changes of Consent

18.1 Right to Withdraw

Where processing or use of a technology depends upon consent, users shall be able to withdraw that consent.



Withdrawal shall be possible without unnecessary difficulty.

18.2 Effect of Withdrawal

Following withdrawal of consent, technologies that depend upon that consent shall no longer be used for the relevant purposes, subject to reasonable technical implementation requirements.

Withdrawal of consent shall not affect the lawfulness of activities carried out before consent was withdrawn.

18.3 Changing Preferences

Users may be provided with a cookie settings or preference mechanism through which they can review and modify previous choices.

The Company shall ensure that material changes to consent choices are appropriately implemented.

18.4 Renewal of Consent

The Company shall consider whether consent should be requested again where:

- the purposes of technologies materially change;
 - new third parties are introduced;
 - significant new technologies are introduced;
 - previous consent can no longer reasonably be regarded as sufficiently informed;
 - applicable legal or regulatory requirements require renewed consent.
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19. Third-Party Technologies

19.1 General Principle

Surkovsky Centre Ltd may use third-party technologies where they provide functionality or services relevant to the Company's legitimate activities.

The Company shall consider privacy and data protection implications before implementing material third-party storage and access technologies.

19.2 Assessment of Third Parties

Where appropriate, the Company shall consider:

- the identity and reputation of the provider;
- the purpose of the technology;



- the categories of information involved;
 - applicable retention periods;
 - onward disclosure;
 - international transfers;
 - security arrangements;
 - contractual protections;
 - available privacy controls.
-

19.3 Embedded Content

The Company's website may contain embedded content or functionality provided by third parties.

Examples may include:

- videos;
- maps;
- social media content;
- external forms;
- interactive tools;
- other embedded services.

Such content may use storage and access technologies independently.

Where appropriate, third-party content requiring non-essential technologies shall be managed in accordance with applicable consent requirements.

19.4 External Websites

The Company's website may contain links to external websites.

Surkovsky Centre Ltd is not responsible for cookies or technologies used independently by external websites after a user leaves the Company's online services.

Users should review the privacy and cookie information provided by the relevant external organisation.

20. Information Collected Through Cookies

20.1 General Principle



The type of information collected through cookies and similar technologies depends upon the purpose and configuration of the technology concerned.

The Company shall seek to limit collection to information reasonably necessary for the relevant purpose.

20.2 Categories of Information

Information may include:

- cookie or session identifiers;
- consent preferences;
- browser type;
- device type;
- operating system information;
- technical configuration;
- IP address where applicable;
- pages visited;
- date and time of access;
- navigation information;
- interactions with website features;
- referral information;
- language or display preferences.

Not all categories will necessarily be collected through every Company website or online service.

20.3 Personal Data

Some information collected through cookies or similar technologies may constitute personal data, particularly where it identifies or can be linked to an identifiable individual.

Where personal data are processed, the Company's Data Protection Policy and Privacy Policy shall apply.

21. Use of Information

21.1 Permitted Purposes

Information obtained through cookies and storage and access technologies may be used for purposes including:



- providing requested online services;
 - maintaining website functionality;
 - maintaining security;
 - remembering user preferences;
 - managing consent choices;
 - measuring website performance;
 - identifying technical problems;
 - improving digital services;
 - understanding website usage;
 - supporting permitted communications and marketing activities.
-

21.2 Purpose Limitation

Information obtained for one specified purpose shall not be used for an incompatible purpose unless such further use is lawful and appropriate.

The Company shall periodically review whether information collected through particular technologies remains necessary for the stated purpose.

21.3 Data Minimisation

The Company shall seek to configure technologies so that they do not collect more information than reasonably necessary.

Where appropriate, aggregation, anonymisation or pseudonymisation shall be considered to reduce privacy risks.

22. Data Protection and Security

22.1 General Principle

Surkovsky Centre Ltd shall take appropriate technical and organisational measures to protect information collected or processed through cookies and other storage and access technologies.

Security measures shall be proportionate to the nature of the information, the purposes of processing and the risks associated with the relevant technology.

22.2 Security Measures

Appropriate measures may include:

- secure configuration of website technologies;



- access controls;
 - encryption where appropriate;
 - secure communications;
 - system monitoring;
 - software updates;
 - vulnerability management;
 - restriction of administrative access;
 - secure management of third-party integrations;
 - appropriate contractual safeguards.
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22.3 Access to Information

Access to information obtained through cookies and similar technologies shall be limited to authorised individuals or service providers who require such access for legitimate purposes.

Access rights shall be appropriately controlled and reviewed.

22.4 Security Incidents

Suspected security incidents involving information collected through cookies or similar technologies shall be managed in accordance with the Company's applicable information security and personal data breach arrangements.

Where an incident constitutes a Personal Data Breach, the Company's Data Protection Policy and applicable breach response procedures shall apply.

23. International Data Transfers

23.1 General Principle

The use of third-party technologies may result in information being transferred to or accessed from locations outside the United Kingdom.

Where such information constitutes personal data, international transfers shall comply with applicable UK data protection requirements.

23.2 Third-Party Providers

Before implementing relevant third-party technologies, the Company shall consider where personal data may be:

- stored;



- accessed;
- processed;
- transferred;
- otherwise made available.

The Company shall take reasonable steps to understand the international processing arrangements of relevant providers.

23.3 Transfer Safeguards

Where required, appropriate transfer mechanisms or safeguards shall be used.

These may include:

- applicable UK adequacy arrangements;
- the UK International Data Transfer Agreement;
- an applicable UK Addendum to recognised contractual clauses;
- other legally recognised safeguards or transfer mechanisms.

Additional technical, contractual or organisational measures may be implemented where appropriate.

24. Retention and Cookie Duration

24.1 General Principle

Cookies and other storage technologies shall not remain active or retain information for longer than reasonably necessary for their specified purposes.

Retention periods shall be proportionate to the relevant functionality and privacy impact.

24.2 Determining Duration

When determining the duration of a cookie or similar technology, the Company may consider:

- the purpose of the technology;
- whether the technology is essential;
- the sensitivity of the information;
- the frequency with which the information is required;
- user expectations;
- applicable legal requirements;
- contractual requirements;



- security considerations;
 - relevant regulatory guidance.
-

24.3 Session Technologies

Session technologies shall normally expire when the relevant session ends unless continued storage is necessary and lawful for a specified purpose.

24.4 Persistent Technologies

Persistent technologies shall have an appropriate defined duration.

The Company shall avoid unnecessarily long or indefinite durations.

24.5 Review of Duration

Cookie and technology durations shall be periodically reviewed.

Where a shorter period can reasonably achieve the relevant purpose, the Company shall consider reducing the duration accordingly.

25. Browser and Device Controls

25.1 General Principle

Users may have additional controls available through their browser, device or operating system for managing cookies and comparable technologies.

These controls operate independently from any consent management mechanism provided directly by Surkovsky Centre Ltd.

25.2 Browser Settings

Depending upon the browser used, users may be able to:

- view stored cookies;
- delete cookies;
- block particular cookies;
- block third-party cookies;
- restrict storage;
- clear browsing information;
- configure privacy preferences.



Users should consult the documentation or privacy settings of their browser for specific instructions.

25.3 Device Settings

Some devices and operating systems provide additional privacy controls relating to:

- tracking;
- advertising identifiers;
- application permissions;
- location information;
- storage;
- cross-site activity.

The availability and operation of these controls depend upon the relevant device and technology provider.

25.4 Effect of Blocking Technologies

Blocking or deleting strictly necessary technologies may affect the operation of certain website functions or prevent requested services from operating correctly.

Rejecting non-essential technologies should not prevent access to website functionality that does not depend upon those technologies.

26. Changes to Technologies Used

26.1 General Principle

The technologies used by the Company's websites and online services may change over time as systems, services and providers develop.

Surkovsky Centre Ltd shall periodically review the cookies and other storage and access technologies deployed through its digital services.

26.2 Introduction of New Technologies

Before introducing a material new technology, the Company shall consider:

- its purpose;
- the information stored or accessed;
- whether personal data are involved;
- whether consent is required;



- whether a legal exception applies;
 - relevant third parties;
 - retention periods;
 - security implications;
 - international transfers;
 - potential risks to users.
-

26.3 Material Changes

Where a material change affects the information previously provided to users or the scope of their consent, the Company shall update relevant notices or consent mechanisms as appropriate.

Where required, renewed consent shall be obtained before the changed technology is activated.

26.4 Removal of Technologies

Technologies that are:

- no longer necessary;
- obsolete;
- unsupported;
- unnecessarily intrusive;
- inconsistent with applicable requirements;

shall be removed or replaced where appropriate.

27. Responsibilities

27.1 Responsibility of the Company

Surkovsky Centre Ltd is responsible for establishing appropriate arrangements governing cookies and other storage and access technologies used through its websites and online services.

The Company shall seek to ensure that such technologies are used lawfully, transparently and securely.

27.2 Responsibilities of the Director

The Director has overall responsibility for oversight of this Cookie Policy.

The Director shall, as appropriate:

- approve this Policy;



- oversee implementation;
 - support compliance with applicable requirements;
 - approve significant changes to cookie practices;
 - oversee significant privacy risks;
 - ensure appropriate corrective actions are taken;
 - support periodic review.
-

27.3 Website and System Administration

Individuals responsible for websites, digital platforms or information systems shall, where applicable:

- implement approved cookie settings;
 - maintain appropriate consent mechanisms;
 - avoid unauthorised technologies;
 - maintain appropriate security controls;
 - support periodic technology reviews;
 - report material changes or identified risks.
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27.4 Employees and Contractors

Employees, contractors, consultants and other authorised individuals shall not introduce tracking technologies, third-party scripts, embedded services or comparable technologies into Company digital services without appropriate authorisation.

They shall comply with this Policy and relevant data protection and information security requirements.

27.5 Third-Party Providers

Third-party providers supplying relevant digital services shall be expected to:

- comply with applicable legal requirements;
 - provide appropriate information concerning their technologies;
 - maintain appropriate security;
 - comply with contractual obligations;
 - support the Company's compliance requirements where applicable.
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28. Monitoring and Compliance

28.1 General Principle

Compliance with this Cookie Policy shall be monitored on a proportionate basis.

The Company shall seek to identify unauthorised, unnecessary, incorrectly classified or improperly configured storage and access technologies.

28.2 Monitoring Activities

Monitoring may include:

- periodic website reviews;
 - cookie scans;
 - review of third-party scripts;
 - review of consent mechanisms;
 - examination of cookie durations;
 - review of website changes;
 - assessment of third-party services;
 - review of complaints or user feedback;
 - regulatory compliance reviews.
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28.3 Non-Compliance

Where non-compliance is identified, appropriate corrective action shall be taken.

Corrective measures may include:

- disabling a technology;
 - changing its configuration;
 - obtaining consent;
 - updating user information;
 - changing a service provider;
 - reducing retention periods;
 - improving consent controls;
 - strengthening security;
 - providing additional training.
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28.4 Complaints and Concerns

Users may raise concerns regarding the Company's use of cookies or similar technologies through the Company's appropriate contact or complaints arrangements.

Where personal data are involved, individuals may also exercise applicable rights under the Company's Privacy Policy and Data Protection Policy.

29. Policy Review

29.1 Regular Review

This Cookie Policy shall normally be reviewed at least annually.

The scheduled Review Date is specified in the document control information.

29.2 Additional Review

An additional review may be undertaken following:

- significant legislative changes;
 - new regulatory guidance;
 - material changes to the Company's website;
 - introduction of new technologies;
 - significant changes to third-party providers;
 - material changes in processing activities;
 - privacy or security incidents;
 - complaints indicating potential compliance issues;
 - identified opportunities for improvement.
-

29.3 Amendments

Amendments to this Policy shall be appropriately documented and approved.

Material changes affecting users shall be communicated through an appropriate mechanism.

The effective date and version information shall be updated where appropriate.

30. Related Company Documents

This Cookie Policy shall be read together with relevant Company documents, including:

- POL-001 Privacy Policy;



- POL-002 Data Protection Policy;
- Information Security Policy;
- Records Management Policy;
- Data Retention Policy;
- Data Breach Response Procedure;
- Website Terms of Use;
- GOV-001 Code of Conduct;
- GOV-003 Governance Structure.

Where another Company document establishes more specific requirements concerning personal data, information security or digital technologies, those requirements shall apply together with this Policy.

31. Approval

This Cookie Policy has been approved by the Director of Surkovsky Centre Ltd and shall take effect from the Effective Date specified in this document.

All individuals responsible for the Company's websites, online services and related technologies are expected to comply with the principles, responsibilities and requirements established within this Policy.

This Policy shall remain subject to periodic review to ensure its continuing effectiveness, legal compliance and alignment with the Company's data protection, information security and governance framework.

Document Title: Cookie Policy

Document Number: POL-003

Company: Surkovsky Centre Ltd

Version: 1.0

Approved by: Board of Directors

Authorised by: Director

Surkovsky Centre Ltd

Signature:

Name: Jozef SURKOVSKY

Date: 1 August 2026

Document History



Version	Date	Description	Approved By
1.0	1 August 2026	Initial issue	Director

End of Document