



COOKIE NOTICE

How Initiative Training Group uses cookies and similar technologies across its website and online services.

Policy owner	Managing Director
Version	2.1
Effective date	23 July 2026
Next review	July 2027, or earlier if our technology, services or legal obligations change
Applies to	www.initiativetraininggroup.com , www.initiativetrainingoracle.com , and any ITG online service that links to this notice
Legal entity	The Initiative Training GP Limited, company number 06204390

This notice should be read with our Privacy and Cookies Policy and Website Terms and Conditions.

At a glance

We use technologies that are essential to operate our website. We use non-essential analytics, advertising or tracking technologies only where the law permits or after you have made a valid choice. You can change that choice through the Cookie Settings link on our website.

1 Purpose and scope

This notice explains how Initiative Training Group ("ITG", "we", "us" or "our") uses cookies and other technologies that store information on, or access information from, your device. It applies to our website and to any online learning or digital service that links to this notice.

Different ITG services may use different technologies. Where this happens, the cookie preference centre or service-specific notice will identify the relevant provider, purpose and duration.

2 What cookies and similar technologies are

Cookies are small data files placed on a computer, phone, tablet or other connected device. They may recognise a browser or device, remember a choice, maintain a secure session, measure how a service is used or support content supplied by another organisation.

The rules also cover technologies that perform a similar function, including pixels, tags, scripts, local storage, software development kits and some forms of device fingerprinting. In this notice, "cookies" includes these similar technologies unless the context requires otherwise.

A cookie can be:

- a session cookie, which normally expires when you close your browser or end a session;
- a persistent cookie, which remains for a defined period or until you delete it;
- a first-party cookie, set by ITG or an ITG service; or
- a third-party cookie, set by another organisation whose service appears on or supports our website.

3 The legal framework and your choices

Our use of cookies is governed principally by the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR), the UK General Data Protection Regulation, the Data Protection Act 2018 and amendments made by the Data (Use and Access) Act 2025.

We may use cookies without consent where a PECR exception applies. This includes technologies needed to transmit communications, technologies strictly necessary to provide a service you request, and certain limited uses for statistical purposes or the appearance and functionality of a service. The newer statistical and appearance exceptions require clear information and a simple, free way to object.

Where no exception applies, we obtain consent before setting or accessing the technology. Consent must be a positive and informed choice. Continuing to browse, remaining silent or using default browser settings does not by itself amount to consent.

Marketing, advertising, cross-site tracking and non-exempt social-media tracking remain disabled until you consent. You can reject non-essential technologies as easily as accepting them and may withdraw consent at any time.

4 How we use cookies

Strictly necessary and security technologies

These enable core functions such as secure navigation, fraud and misuse prevention, load balancing, form submission, account authentication, shopping-basket functions, access to learning systems and the recording of

your cookie choices. The service may not operate properly without them. We do not use them for advertising or unrelated profiling.

Functional and appearance technologies

These may remember choices such as language, display, accessibility or interface preferences. We may use them without consent only where the legal conditions for the appearance exception are met and you are given a simple, free way to object. Otherwise, we ask for consent.

Analytics and statistical technologies

These help us understand, in aggregate, how visitors use our website, which pages are useful, how visitors move through the site and whether technical changes improve performance. We may rely on the statistical-purposes exception only where the technology is used solely to produce aggregate statistics for improving the service, individual-level information is not retained longer than necessary, the information is not used to identify, profile or make decisions about people, and a simple, free objection mechanism is available. Where those conditions are not met, analytics remains off until you consent.

Marketing and advertising technologies

These may measure advertising campaigns, connect visits with advertisements or support personalised or non-personalised advertising. They require consent. ITG will not treat advertising revenue, campaign measurement or promotional convenience as making these technologies strictly necessary.

Embedded content and social-media technologies

Pages may contain content or links supplied by third parties, such as video, maps, webinar tools or social-media services. We configure embedded content in a privacy-conscious way where practical. Where a provider would use cookies for analytics, advertising or tracking, the content will be blocked until you consent or actively request the feature. The provider may then process information under its own privacy terms.

5 Cookie register

The table below describes the technologies that may be used across ITG services. The cookie preference centre on the relevant service provides the current technical names and controls. A service may not use every item listed.

Technology / example	Provider	Category	Purpose	Typical duration
Session or security identifier (technical name depends on the service)	ITG, hosting provider or learning platform	Strictly necessary	Maintains a secure session, authenticates a user, prevents misuse, balances traffic or completes a requested transaction.	Session, or the shortest period needed for the function
Cookie preference record	ITG or our consent-management provider	Strictly necessary	Records whether you accepted, rejected or customised non-essential technologies so that the site can respect your choice.	Normally up to 6 months
_ga	Google Analytics, where enabled	Analytics / statistics	Distinguishes browser instances to produce website usage statistics. Used only in accordance with the consent choice or a valid statistical-purposes exception.	Up to 2 years

Technology / example	Provider	Category	Purpose	Typical duration
<code>_ga_<container-id></code>	Google Analytics, where enabled	Analytics / statistics	Maintains session state for a Google Analytics 4 property. Used only in accordance with the consent choice or a valid statistical-purposes exception.	Up to 2 years
<code>_gcl_*</code>	Google, where advertising measurement is enabled	Marketing / advertising	Measures whether a visitor who interacted with a Google advertisement later completed an action on the website.	Up to 90 days
IDE or similar advertising identifier	Google advertising services, where enabled	Marketing / advertising	Supports advertising delivery, frequency control, campaign measurement or personalisation on non-Google sites.	Up to 13 months in the UK
Embedded media or social-service technologies	The provider named in Cookie Settings, such as a video or social-media provider	Functional or marketing, depending on purpose	Provides requested third-party content or functionality and may also measure use or support advertising, depending on the provider and your choice.	Varies by provider and is shown in Cookie Settings

Important: cookie names and durations can change when providers update their services. ITG should review this register against a technical cookie scan whenever the website or connected services change.

6 Third-party providers

Where another organisation sets or accesses a technology through an ITG service, we take reasonable steps to understand what it does, identify the provider, configure it appropriately and ensure that a suitable contract or arrangement is in place where required. Third parties may process information outside the United Kingdom. Where personal data is involved, our Privacy and Cookies Policy explains how we address international transfers.

For third-party analytics to fall within the statistical-purposes exception, the provider must act on our behalf, use information only to help improve our website or service, and must not combine it with information from other customers or use it for advertising, profiling or other purposes. Otherwise, consent is required.

7 Managing or withdrawing your choice

You can use the Cookie Settings link displayed on our website to:

- accept or reject non-essential technologies;
- choose between available categories;
- object to technologies used under the statistical or appearance exceptions, where applicable; and
- withdraw or change consent at any time.

Withdrawing consent does not make earlier processing unlawful, but we will stop using the relevant technologies for future visits once your updated choice has been applied. We may ask you to review your choice when our use of technology changes or after a reasonable period. As a general operating standard, ITG will normally refresh stored preferences at least every six months.

8 Browser and device controls

Most browsers allow you to view, delete or block cookies. Device settings and privacy tools may also limit tracking or advertising identifiers. These controls are useful, but they are not a substitute for our duty to obtain consent where it is required.

Blocking all cookies may prevent login, form submission, online learning, basket or preference functions from working correctly. Private or incognito browsing usually limits what remains after a session, but it does not necessarily stop cookies or other technologies from being used while the session is open.

9 Retention, security and personal data

We keep information for no longer than necessary for the relevant purpose and apply appropriate technical and organisational safeguards. Some cookie identifiers and associated data may be personal data even when they do not directly contain a name or contact details. Where our use of cookies involves personal data, our Privacy and Cookies Policy applies in addition to this notice.

10 Changes to this notice

We will review this notice at least annually and whenever we introduce a new online service, change a provider, alter the purpose of a technology or identify a relevant legal or regulatory change. The effective date and version number appear on the first page.

11 Contact

Questions about this notice, our cookie choices or the use of personal data should be sent to: **Initiative Training Group**

Email: james.gribben@initiativetraininggroup.com

Website: www.initiativetraininggroup.com