

Affiliate Window ePrivacy Directive in brief: May 2012

This document acts as a two page, broad overview of the revised ePrivacy Directive. We strongly encourage you to read our full 25-page guide [HERE](#).

Auditing

Every site is being encouraged to complete an audit of their cookies. This audit could be created in a spreadsheet and formatted like this:

Cookie Function (tracking, reporting etc.)	Cookie 'name' or ID	Cookie Purpose	What data does the cookie hold? (further detail)	What is the cookie expiry date?
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Here is a ten step audit process you might undertake:

1. Check the cookies you use on your website.
2. Identify what function each of them have (tracking, analytics etc.).
3. Make a note of what information is stored, in doing so you will be able to decide how intrusive the cookies are. Most affiliate cookies will just store non-personally identifiable information; you can see what each of them store below as well as via our FAQs.
4. What type of cookies are they? Most affiliate cookies are third party for example.
5. Make a note of the companies that set these types of cookies (Affiliate Window, other networks – or you might want to just say 'affiliate networks', Google Analytics etc.)
6. How long do each of the cookies last? We have indicated the length of time each of our cookies is stored for in our accompanying document.
7. Are there any unnecessary cookies that you don't use anymore? You could carry out a clean-up.
8. How much information do they store? How intrusive are they (or how much personally identifiable data do they store) versus whether they're necessary for the site to function. This is an important distinction.
9. Keep all this information to hand in one document.
10. Look to make this information available via a link on your site.

We are not in position to recommend cookie auditing tools but free software is available from [Ghostery](#).

If you need to see the full suite of Affiliate Window and buy.at cookies you can access these here:

1. This [file](#) contains the cookies we use when an affiliate logs into our interface together with our tracking cookies. As many affiliates are sole traders we wanted to make this information available (it will feature in our 'Links and Tools' section of the interface).
2. If you're an advertiser and want to know what tracking cookies we use you can see them [here](#).
3. This [file](#) is for your reference and shows the cookies we use on our corporate site and blog.

It is your choice as to how much detail you offer. For your reference you may want to see what [voucherCodes.co.uk](#) and [John Lewis](#) are doing.

What else should you consider?

The cookie audit is one element of an overall approach to the ultimate goal of informed consent. The additional elements you should consider are:

- A) Audit your site as outlined above and keep this document stored at your home/office
- B) Add a plain English guide to your site that explains what affiliate marketing is and how you monetise your content. The Affiliate Marketing Council will be releasing a site that contains all the content you need. Affiliate Window contributed most of this content and we will be sending out more information on it shortly.
- C) Create an 'about cookies' or 'about our site' link that is prominent from your homepage. Don't hide it away (this is one of the main criticisms of many current privacy policies). Use this page to offer links to the plain English guide as well as examples of the cookies you use. Also offer guidance on how to change cookie storage options through browser settings.
- D) Find additional resources you can link to that help those consumers who want to find out more than you've provided. This could be sites such as www.allaboutcookies.org or www.aboutcookies.org/. Apply a 'layered' approach whereby you make straightforward information easily accessible and then offer deeper links and more granular insights for those consumers who want to read on.
- E) Possible technical solution: if you want to implement this include a 'slider' as featured on the BT.com homepage (bottom right hand corner). There is nothing definitive on what this should look like but the ICO provides some examples from page 15 in [this document](#). We believe the search for technical solutions is ongoing as referenced earlier and increasing numbers of best practice examples will emerge that Affiliate Window will look to showcase.

You may want to overlay a pop-up that allows users of your site to find out more about cookies or how your site works. This could also include a short description of how and where browser settings can be changed.

Changes to Publisher Terms and Conditions:

We are introducing [new publisher terms and conditions](#). They have been shortened with a focus on plain English. They also make reference to the ePrivacy Directive.

If you're a publisher you will need to accept these when you log into the Affiliate Window interface over the next few days.