

Website Cookie Consent Protocol

Background

Cookies are small files which are stored on a user's computer. They are designed to hold a modest amount of data specific to a user and website and can be accessed either by the web server or the user's computer. This allows the server to deliver a page tailored to a particular user, or the page itself can contain some script which is aware of the data in the cookie and so is able to carry information from one visit to the website (or related site) to the next. Until recently, most website owners relied on a user's implied consent to use cookies. Under new regulations, website owners are required to permit users to opt-in for consent to use cookies and "implied" consent is no longer an option.

Currently, cookie consent is a bit of a gray legal area, largely, because consent requirements will likely change when certain regulations will be launched later this year. Further, in May 2018 an EU law called the General Data Protection Regulation ("GDPR") was enacted. The GDPR is a regulation under the laws of the European Union on data protection and privacy for all individuals within the EU and related economic areas. The GDPR also addresses practices that must be followed in relation to the export of personal data outside the EU designed to give EU residents the control on the usage of their personal data. The law also impacts business and organizations not located in the EU but conduct certain types of communication and activities in the EU (for example, the Sorority's ICHQ engaging in membership activities with a member in the EU).

Adoption of Cookie Consent Protocol (Protocol)

IT privacy compliance impacts how the Sorority treats cookies on its website. Given the planned international expansion of the Sorority, it is widely considered a best practice for companies and organization like the Sorority to update policies to comply with the GDPR and other anticipated privacy regulations. There are a variety of consent mechanisms that websites are utilizing (depending on their risk tolerance) to allow users to give consent to use cookies. Given the modest contacts the Sorority has in the EU, the recommended approach is adding a cookie consent banner to the website where the user may continue to use a website without making a choice, but the banner remains until a user makes a choice. When the Sorority's EU contacts significantly increase the Sorority should consider adopting a more restrictive method. Below is the proposed Cookie Consent language:

YOUR COOKIE SETTINGS

We and our third-party partners use cookies and similar technology for this website to function properly and for website performance, social media functionality and personalized advertising purposes. Cookies help us give you the best website experience possible. These small text files track your website usage, but do not tell us who you are. You may also learn more about these cookies and how we process your personal data by reading our [Privacy Policy](#). Do you accept these cookies and the processing of associated personal data?

YES, I ACCEPT

If you change your mind, you can always amend your website cookie preferences by visiting the "Cookie Settings" at the bottom of each web page.

Applicability

This notification will be added to all of the Sorority's websites (www.sgrho1922.org, www.sgrho100.org, www.sgrho1922.today and www.sgrhoboule.org). The Sorority shall revisit the consent protocol when the Sorority begins robust membership engagement in the EU.

The Effective Date of this Protocol is October 1, 2018.