

# Cookie Policy: Privacy by Default

## 1. Purpose

This policy defines how CKBR China Consultancy (the "Company") utilises cookies and similar technologies on its website. Our objective is to provide a secure, functional, and transparent digital environment for our clients. In alignment with our "Privacy-first" values, this document clarifies the limited scope of our technical data collection and ensures users understand that we do not engage in non-essential tracking or behavioral profiling.

## 2. The Privacy-first Approach

We prioritise your privacy by eliminating all non-essential tracking.

- **No Marketing Cookies:** We do not use Facebook Pixels or advertising trackers.
- **No Analytics Cookies:** We do not use Google Analytics or similar third-party profiling tools.
- **No Third-Party Tracking:** We do not share your browsing habits with any external data brokers or social media platforms.

## 3. What are "STRICTLY NECESSARY" Cookies?

This website exclusively utilises First-Party, Strictly Necessary cookies essential for security, integrity, and core site functionality. These are essential for:

- **Security:** Protecting the site against cyberattacks and unauthorized access.
- **Stability:** Ensuring the website loads correctly and maintains a consistent connection.
- **Functionality:** Allowing the basic features of the site, such as our contact forms and secure payment portals, to operate securely.

### 3.1 Technical Cookie Inventory

To ensure full transparency, we maintain an inventory of the strictly necessary first-party cookies currently active on our platform. These cookies are essential for the technical stability and cybersecurity of our site.

Cookie Name	Provider	Purpose	Duration
__cfduid	Cloudflare/ Hostinger	<b>Security:</b> Identifies individual clients behind a shared IP address and applies security settings on a per-client basis.	<b>30 Days</b>
XSRF-TOKEN	Hostinger	<b>Security:</b> Prevents Cross-Site Request Forgery (CSRF) attacks on contact/payment forms.	<b>Session</b>
hs_session	Hostinger	<b>Functionality:</b> Maintains a secure connection while you navigate the site or complete a payment.	<b>Session</b>

### 4. Why Don't You See a Consent Banner?

Under the UK GDPR, ePrivacy Regulations, and the Data (Use and Access) Act 2025, "Strictly Necessary" cookies are exempt from the requirement for prior user consent. We do not use any non-essential, tracking, or marketing cookies, therefore, a consent banner is not legally required for this website.

### 5. Your Browser Controls

While these cookies are essential for the site to function, you remain in control. You can choose to block or delete cookies through your browser settings (for example, Chrome, Safari, Firefox, etc).

We proactively honour **Global Privacy Control (GPC)** signals. Because our website is designed with "Privacy by Default" and contains no tracking or profiling cookies, our systems are already aligned with the highest level of privacy settings your browser can request.

Note: If you choose to disable all cookies, certain parts of our website, specifically the secure payment portal and contact forms, may not function as intended.

## 6. No Data Sale or Cross-Border Profiling

In compliance with both UK Law and China's PIPL, we explicitly state:

- **No Sale of Data:** We never sell cookie-related data to third parties.
- **No Profiling:** No data captured by these essential cookies is used to profile users in the UK or China.
- **Purpose Limitation:** Any technical data captured is used solely for the immediate session to ensure site performance.

**Geographic Processing:** Technical data required for site stability and security is processed on secure servers located in the **United Kingdom/EEA**. In compliance with China's Personal Information Protection Law (PIPL), no "Essential Cookie" data is transferred to or stored in the PRC unless explicitly required to complete a secure payment initiated by the user.

## 7. Transparency & Ethics

CKBR China Consultancy is committed to 2026 UK transparency standards for professional services. We disclose our use of cookies to ensure our clients understand the purpose of necessary data collection.

## 8. Annual Review and Compliance

**Policy Review:** This disclosure is reviewed annually to ensure continued alignment with international AI safety standards and data protection regulations. We are committed to evolving our technological disclosures as AI capabilities and regulatory frameworks mature.

## 9. Privacy Inquiries

If you have questions regarding this Cookie Policy or our broader data protection practices, please contact us at [enquiries@ckbr.co.uk](mailto:enquiries@ckbr.co.uk).

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## Version History

Version	Date	Description of Changes
v1.0	01/03/2026	Initial Release
v1.1	06/03/2026	Added technical cookie inventory, GPC signal acknowledgment, and defined geographic processing boundaries.

**Next Expected Review : March 2027**