

COOKIE POLICY

Last Updated: [DATE]

1. INTRODUCTION AND SCOPE

This Cookie Policy (“Policy”) explains how Culinary For Royalty (“we,” “us,” or “our”), a business operating in Chicago, Illinois, uses cookies and similar technologies on our website <https://www.culinaryforroyalty.com> (the “Website”).

This Policy provides detailed information about what cookies are, how and why we use them, the types of cookies we use, and how you can control your cookie preferences. This Policy should be read in conjunction with our Privacy Policy, which provides more information about our data processing practices.

Our use of cookies and similar technologies is governed by the Illinois Personal Information Protection Act (815 ILCS 530) and the Federal Trade Commission Act (15 U.S.C. 41 et seq.), which establish requirements for transparency, notice, and user control regarding online tracking technologies.

1.1 What Are Cookies?

Cookies are small text files that are placed on your device (computer, tablet, or mobile) when you visit our Website. They allow our Website to recognize your device and store certain information about your preferences or past actions. Cookies can be “persistent” or “session” cookies. Persistent cookies remain on your device when you go offline, while session cookies are deleted as soon as you close your web browser.

1.2 Similar Technologies

In addition to cookies, we may use other similar technologies on our Website, including:

- **Web beacons (pixel tags):** Small transparent image files used to monitor your journey around our Website or to determine if you have viewed particular content.
- **Local storage:** Technologies like HTML5 localStorage and IndexedDB that provide web applications ways to store data on your device.
- **Device fingerprinting:** Collection of information about your device’s attributes to create a unique identifier.

For simplicity, we refer to all these technologies collectively as “cookies” throughout this Policy.

2. TYPES OF COOKIES USED

While we aim to minimize our use of cookies, we do utilize several types to provide you with the best possible experience on our Website. In accordance with the Illinois State Agency Website Act (5 ILCS 177) requirements for cookie categorization, we classify our cookies as follows:

2.1 Essential Cookies (Strictly Necessary)

These cookies are essential for the Website to function properly and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in, or filling in forms. These cookies do not store any personally identifiable information.

Examples of essential cookies we use:

- Session cookies for managing user sessions
- Security cookies for detecting authentication abuses
- Load balancing cookies for server allocation
- User interface customization cookies for remembering user preferences

2.2 Performance and Analytics Cookies

These cookies allow us to count visits and traffic sources so we can measure and improve the performance of our Website. They help us to know which pages are the most and least popular and see how visitors move around the Website. All information these cookies collect is aggregated and therefore anonymous.

We use Google Analytics to help us understand how our Website is being used. Google Analytics generates statistical and other information about Website use by means of cookies, which are stored on users' computers. The information generated relating to our Website is used to create reports about the use of the Website. Google will store this information. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

2.3 Advertising and Targeting Cookies

These cookies may be set through our Website by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other websites. They do not directly store personal information but are based on uniquely identifying your browser and internet device.

We use Google Ads to deliver targeted advertisements to you on third-party websites. These cookies remember that you have visited our Website and this information is shared with other organizations such as advertisers.

2.4 Social Media Cookies

These cookies are set by social media services that we have added to the Website to enable you to share our content with your friends and networks. They are capable of tracking your browser across other sites and building up a profile of your interests. This may impact the content and messages you see on other websites you visit.

We have integrated Instagram features on our Website, which may set cookies when you interact with these features.

3. PURPOSE AND LEGAL BASIS FOR COOKIE USE

3.1 Purposes for Using Cookies

We use cookies for the following purposes:

- **Essential Website Functionality:** To enable core Website functions such as page navigation, secure areas access, and form submissions.
- **Website Performance and Analytics:** To understand how visitors interact with our Website, which pages are most popular, and identify areas for improvement.
- **Personalized Experience:** To remember your preferences and settings to enhance your browsing experience.
- **Marketing and Advertising:** To deliver advertisements relevant to your interests and measure the effectiveness of our marketing campaigns.
- **Social Media Integration:** To enable social sharing functionality and connect with our social media presence.

3.2 Legal Basis for Processing

Our legal basis for processing data collected by cookies depends on the type of cookie:

- **Essential Cookies:** The legal basis is our legitimate interest in providing a functioning and secure Website.
- **Non-Essential Cookies:** The legal basis is your consent, which we obtain through our cookie consent banner before placing these cookies on your device.

Our cookie practices comply with the Illinois Protecting Household Privacy Act and the Children's Online Privacy Protection Act (15 U.S.C. 6501 et seq.) where applicable.

4. COOKIE CONSENT MECHANISM

4.1 How We Obtain Your Consent

In compliance with the Illinois State Agency Website Act (5 ILCS 177) requirement for express consent and COPPA Rule Updates (16 CFR 312) for consent mechanisms, we use a cookie consent banner that appears when you first visit our Website. This banner provides you with clear information about our cookie use and offers you the following options:

- **Accept All:** Consent to all cookies, including performance, analytics, advertising, and social media cookies.
- **Reject All:** Reject all non-essential cookies.
- **Customize Settings:** Select which categories of non-essential cookies you wish to accept or reject.

4.2 Changing Your Consent

You can change your cookie preferences at any time by clicking on the “Cookie Settings” link in the footer of our Website. This will reopen the cookie consent banner where you can adjust your preferences.

4.3 What Happens If You Decline Cookies

If you decline non-essential cookies, you will still be able to use our Website, but some features may be limited. For example:

- We won’t be able to recognize your device on return visits
- You may need to reset your preferences each time you visit
- Certain personalized features may not function properly
- You may see less relevant advertisements

5. DATA RETENTION PERIODS

5.1 Session Cookies

In accordance with your preferences, we primarily use session cookies, which are temporary and are deleted automatically when you close your browser. These cookies do not remain on your device beyond your browsing session.

5.2 Persistent Cookies

While we prioritize session cookies, some functionality requires persistent cookies. When we use persistent cookies, we limit their duration as follows:

- **Preference Cookies:** Up to 1 year
- **Analytics Cookies:** Up to 2 years (as set by Google Analytics)
- **Advertising Cookies:** Up to 90 days (as set by Google Ads)

5.3 Data Retention Compliance

Our cookie retention practices comply with the Illinois Personal Information Protection Act (815 ILCS 530) requirements for data retention limits and COPPA retention guidelines, which require that we retain personal information only for as long as reasonably necessary to fulfill the purpose for which it was collected.

6. THIRD-PARTY SERVICES AND ANALYTICS

6.1 Google Analytics

We use Google Analytics to understand how visitors interact with our Website. Google Analytics places cookies on your device to collect information about your browsing behavior. This information is generally transmitted to and stored by Google on servers in the United States.

We have implemented the following measures to protect your privacy when using Google Analytics:

- IP anonymization (your IP address is truncated before being stored)
- Data sharing settings are limited to the minimum necessary
- We do not use Google Analytics Advertising Features

For more information about Google Analytics cookies, please visit:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

6.2 Google Ads

We use Google Ads to deliver targeted advertisements to you on third-party websites. Google Ads places cookies on your device to track your browsing behavior across websites and to serve you advertisements based on your previous visits to our Website.

For more information about Google Ads cookies, please visit:

<https://policies.google.com/technologies/ads>

6.3 Third-Party Data Processing

While we have stated “No third-party data sharing” in our preferences, it’s important to clarify that the use of services like Google Analytics and Google Ads inherently involves sharing some data with these third-party service providers. However, our agreements with these providers strictly limit how they can use your data, and they are prohibited from sharing your data with other parties without our permission.

In compliance with COPPA (15 U.S.C. 6501 et seq.) regarding disclosure of third-party data collection practices, we confirm that these third-party services:

- Only process data for the purposes specified in our agreements
- Maintain appropriate security measures to protect your data
- Do not use your data for their own commercial purposes beyond providing their services to us

7. SOCIAL MEDIA INTEGRATION

7.1 Instagram Integration

Our Website integrates with Instagram through sharing buttons and embedded posts. When you interact with these features, Instagram may collect information about your browsing behavior, including the pages you visit and actions you take on our Website.

Instagram may set cookies on your device even if you do not click on the Instagram features. These cookies help Instagram recognize you when you later visit their platform and may be used to target advertisements to you.

7.2 Social Media Privacy Policies

We do not control the cookies set by social media platforms. For more information about how Instagram processes your data, please review their privacy policy:

- Instagram (Facebook): <https://help.instagram.com/519522125107875>

7.3 Disabling Social Media Cookies

You can prevent social media platforms from setting cookies by:

- Adjusting your cookie preferences in our cookie consent banner
- Using browser extensions designed to block social media trackers
- Logging out of your social media accounts before visiting our Website

8. CHILDREN’S PRIVACY PROTECTION

8.1 COPPA Compliance

In compliance with the Children’s Online Privacy Protection Act (15 U.S.C. 6501 et seq.) and COPPA Rule Updates (16 CFR 312), our Website is not directed at children under 13 years of age, and we do not knowingly collect personal information from children under 13 years of age.

8.2 No Targeting of Children

We do not use cookies or other tracking technologies to specifically target or track children under 13 years of age. Our advertising and analytics practices are not designed to appeal to or target children.

8.3 Parental Rights

If you are a parent or guardian and believe that we may have inadvertently collected personal information from your child under 13 years of age, please contact us immediately at Oliver@culinaryforroyalty.com. We will promptly:

- Review the information provided
- Delete any personal information collected from the child
- Ensure that the child’s information is not used or disclosed
- Respond to your inquiry with confirmation of our actions

9. USER RIGHTS AND COOKIE MANAGEMENT

9.1 Your Rights

In accordance with the Illinois Personal Information Protection Act (815 ILCS 530), you have the following rights regarding cookies and the data they collect:

- **Right to Access:** You can request information about the cookies we use and the data they collect.
- **Right to Deletion:** You can request the deletion of cookie data associated with you.
- **Right to Opt-Out:** You can opt out of non-essential cookies at any time.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of these rights.

9.2 Browser Controls

Most web browsers allow you to manage your cookie preferences. You can:

- Delete cookies from your device
- Block cookies by activating the setting on your browser that allows you to refuse all or some cookies
- Set your browser to notify you when you receive a cookie

Please note that if you choose to block all cookies (including essential cookies), you may not be able to access all or parts of our Website.

Here are links to instructions for managing cookies in common browsers:

- Google Chrome: <https://support.google.com/chrome/answer/95647>
- Mozilla Firefox:
<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Safari: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471>
- Microsoft Edge:
<https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09>

9.3 Automated Deletion Request Form

As per your preference, we provide an automated online form for deletion requests. To submit a request to delete your cookie data:

1. Visit our Website and navigate to the “Privacy Center” page
2. Select “Delete My Data” from the options
3. Complete the form with the required information
4. Submit your request

We will process your request within 30 days and send confirmation when completed.

10. SECURITY MEASURES

10.1 Cookie Security

We implement appropriate technical and organizational measures to ensure the security of the data collected through cookies, including:

- **Encryption:** All data transmitted between your browser and our servers is encrypted using industry-standard TLS (Transport Layer Security) protocols.
- **Access Controls:** We restrict access to cookie data to authorized personnel only, based on the principle of least privilege.
- **Data Minimization:** We collect only the minimum amount of data necessary for the intended purpose.
- **Regular Security Assessments:** We conduct periodic reviews of our cookie security practices.

10.2 Third-Party Security

We require our third-party service providers, such as Google Analytics and Google Ads, to maintain appropriate security measures to protect your data. These providers are contractually obligated to implement security controls that meet industry standards.

10.3 Security Limitations

While we take reasonable measures to protect your data, no method of transmission over the Internet or electronic storage is 100% secure. We cannot guarantee absolute security of data collected through cookies.

11. CONTACT INFORMATION FOR PRIVACY INQUIRIES

11.1 Dedicated Privacy Contact

In compliance with COPPA disclosure requirements for dedicated privacy contacts and Illinois law requirements for accessible contact information, we provide the following contact information for privacy-related inquiries:

Email: Oliver@culinaryforroyalty.com

Phone: +1 708-808-7383

11.2 Response Time

We strive to respond to all privacy-related inquiries within 14 business days. For complex inquiries, we may require additional time and will notify you if this is the case.

11.3 Complaint Process

If you believe that our cookie practices do not comply with applicable law or this Policy, you may file a complaint using the contact information provided above. We will investigate your complaint and respond within 30 days.

12. POLICY UPDATES AND REVIEW SCHEDULE

12.1 Regular Review Schedule

In accordance with the Illinois Personal Information Protection Act (815 ILCS 530) requirements for annual policy reviews and notification of material changes, we review this Cookie Policy:

- Annually, at minimum
- Whenever we make significant changes to our cookie practices
- When new laws or regulations affecting our cookie practices come into effect

12.2 Notification of Changes

When we make material changes to this Policy, we will:

- Post a notice on our Website at least 30 days before the changes take effect
- Update the “Last Updated” date at the top of this Policy
- Provide a summary of the key changes
- Obtain renewed consent for non-essential cookies if required by law

12.3 Version History

We maintain a record of all previous versions of this Policy. If you wish to review a previous version, please contact us using the information provided in Section 11.

13. EFFECTIVE DATE AND GOVERNING LAW

13.1 Effective Date

This Cookie Policy is effective as of [DATE] and supersedes all previous versions.

13.2 Governing Law

This Policy is governed by the laws of the State of Illinois, United States, without regard to its conflict of law provisions. Any disputes relating to this Policy shall be subject to the exclusive jurisdiction of the courts of Cook County, Illinois.

13.3 Severability

If any provision of this Policy is found to be unenforceable or invalid, the remaining provisions will remain in full force and effect. The unenforceable or invalid provision shall be replaced by a

valid and enforceable provision that comes closest to the intention underlying the unenforceable provision.

By using our Website, you acknowledge that you have read and understood this Cookie Policy.