

Policy Document

# Cookie Policy

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Effective date: October 2026 onwards



# Cookie Policy

This Cookie Policy explains how Spiral Communications Limited uses cookies and similar technologies on our website, <http://spiralcom.co.uk>. This policy should be read alongside our primary Privacy Policy.

## What Are Cookies?

Cookies are small text files placed on your device (computer, smartphone, or tablet) when you visit a website. They are widely used to make websites work more efficiently, ensure secure delivery of content, and provide analytical information to the website owners.

## How We Use Cookies

Our website relies on cookies for two primary reasons: to ensure the core functionality and security of our hosting infrastructure, and to analyze visitor behavior to improve our services.

We categorize our cookies as follows:

- **Strictly Necessary (Essential) Cookies:** These cookies are strictly necessary to deliver site content reliably and securely, ensure platform stability, and defend against cyber threats like malicious traffic and DDoS attacks. Because our digital assets are hosted on and delivered through Figma Sites, these essential cookies are set by Figma, Inc.. You cannot opt out of these cookies as the website cannot function properly without them.
- **Analytics and Performance Cookies:** We use Google Analytics to collect technical information about how visitors interact with our website, including pages visited, referring URLs, and browser types. We use this information to analyze site traffic, optimize user experience, and monitor website performance. These cookies are only placed on your device if you provide explicit consent via our cookie banner.

## Specific Cookies We Use

| Cookie Name     | Provider    | Category  | Purpose                                                                                                                                                           | Duration        |
|-----------------|-------------|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| __figma_session | Figma, Inc. | Essential | Used to securely deliver website content and maintain server performance and platform stability.                                                                  | Session         |
| _ga             | Google LLC  | Analytics | Used by Google Analytics to distinguish unique users and track technical information to optimize user experience. Your IP address is anonymized prior to storage. | Up to 14 months |

## Managing Your Cookie Preferences

When you first visit our website, you are presented with a cookie banner that allows you to accept or decline non-essential cookies. The legal basis for processing Google Analytics data is your explicit consent.

You may withdraw or modify this consent at any time through our cookie settings. Additionally, most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit standard consumer resources like [aboutcookies.org](https://aboutcookies.org)

## International Data Transfers

Data collected by our Google Analytics cookies may be transferred to Google LLC servers in the United States. This data is safeguarded by standard contractual clauses and recognized adequacy frameworks. Essential diagnostic metadata processed by Figma may also involve transfers outside the UK or EEA, which are similarly safeguarded using mechanisms such as the UK Extension to the EU-U.S. Data Privacy Framework (DPF) and UK-approved Standard Contractual Clauses.

## Contact Us

If you have any questions about our use of cookies or your personal data, please contact our Data Controller:

- **Company:** Spiral Communications Limited
- **Data Protection Contact:** Simon Turner, Managing Director
- **Email:** [reception@spiralcom.co.uk](mailto:reception@spiralcom.co.uk)
- **Address:** Manor House, 1 Manor Street, Sheepscar Leeds, West Yorkshire, LS7 1PZ