



affilinet tracking cookies

A guide to affilinet's tracking technology

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Introduction

What's covered in this Paper?

- How affilinet uses cookies to enable online commerce
- What exactly do our cookies do and how they do it
- How should a cookie audit look like
- An FAQ section including all recent customer requests regarding our tracking technology and cookies

1. Why does affilinet use cookies?

affilinet is one of the leading providers of performance marketing in Europe. "Performance Marketing" means the advertiser only pays a website publisher a fee if a referred visitor completes a predetermined action. The action can be separated in three general categories:

- If a consumer clicks on advertising creative on a publisher's site and goes on to complete a **sale** within the advertiser's online shop
- If the customer submits contact data in one of **our lead generation** campaigns e.g. books a test drive with a leading car manufacturer
- Additionally we offer CPO (Cost per Order) programs, so called eReach or Post-View programs based on banner impressions.

Figure 1 – the Commercial Model for Performance Marketing

Base Model – Business Flow



Source: affilinet GmbH

affilinet provides a flexible and scalable platform to track and report on these actions. For many publishers and advertisers, affilinet also supplies strategic account management. affilinet charges the advertiser a fee for the provision of these services. In order to provide its services and to enable the model described above, affilinet utilises proprietary technology to record a users interactions with websites. This is achieved by a combination of techniques, the main one being the setting of cookies when a user visits a publisher website. That cookie is then accessed and read when the user completes a valid action on an advertiser website.

affilinet does not gather personal information about a customer or transmit this kind of information to any third party. It does not record behavior or preferences of users. Instead, it just records anonymous views & clicks on publisher websites and completed actions on advertisers websites. However if by law the cookie itself, irrespective of its content, is defined as “personal information” this statement does not apply.

2. How does affilinet’s tracking work in detail?

This paragraph will briefly explain the basic flow of a cookie from affilinet and then help you to answer questions regarding the classification of the affilinet cookies in light of the current implementations of the EU Privacy Directive.

2.1 User flow

In principle when the user clicks on or in some cases views a banner, affilinet writes a tracking cookie on the user’s machine.

Figure 2 - How affilinet’s Tracking Works



Source: affilinet GmbH

This cookie remains active for a certain period of time depending on settings defined by the advertiser – the default setting is 30 days.

Let’s assume the user clicked on a banner 2 hours ago and then visits the advertiser online store and makes a purchase later that day. Upon check-out (on the shop confirmation page) another tracking mechanism checks whether there is an affilinet cookie on the end-users machine and if so, which publisher (NOT user) this cookie is from and the date/time the original click occurred.

This mechanism guarantees that the websites that places advertising creative to finance their content will get rewarded if their advertisement leads to a sale.

2.2 Cookie Definitions

Currently, there are several classification frameworks being discussed in relation to the EU Privacy Directive

The EU Directive applies to all methods of storing and retrieving information on a user's terminal. Classic browser cookies, local shared objects (commonly referred to as "flash cookies") and any other method will be collectively referred to as cookies throughout this paper.

Although the EU Directive is discussed in detail elsewhere, the classification of cookies is important and should be adopted by all parties in the market. In this paragraph, we will present the classifications that are currently in use, so you can also apply these definitions to the cookies used on your own site.

2.2.1 Session & Persistent Cookies

Cookies can either expire at the end of a browser session or they can be stored (also called persisted) for longer. The Directive applies to both types of cookies.

2.2.2 Session Cookies

Session cookies allow websites to link the actions of a user during a browser session. A core use case is for authentication, so that passwords do not need to be re-entered on each page load. Session cookies expire at the end of a browsing session, for this reason they may be considered less intrusive than persistent cookies.

Affilinet answers:

Affilinet uses session cookies as well as persistent cookies that are stored over a certain period of time pre-defined by the advertiser -the standard time period is 30 days.

2.2.3 Persistent Cookies

Persistent cookies are stored on a user's device beyond a single browser session, which allows the preferences or actions of the user to be remembered. Persistent cookies may be used for a variety of purposes,

including remembering users' preferences and choices when using a site or to target advertising. However also persistent cookies are also normally set to expire after a certain amount of time.

2.2.4 First & Third Party Cookies

Whether a cookie is "first" or "third" party depends on the website or domain placing the cookie. First party cookies in basic terms are cookies set by the website visited by the user. Third party cookies are cookies that are set by a domain other than the one being visited by the user. If a user visits a website and a separate company sets a cookie from a different domain this would be a third party cookie.

Thus it is very clearly defined, that the regulator does not require website owners to technically differentiate between 1st and 3rd party but instead offer a definition that focuses on user understanding. So

from the user perspective it will always be assumed that the site visited places the cookie.

Affilinet answers:

According to the user focused definition of cookies in the EU Directive, affilinet cookies are to be considered 3rd party cookies.

2.2.5 Classification of affilinet's Cookies

The core new requirement of the Directive is that businesses and individuals must now obtain consent from users or subscribers to store and access cookies on their devices. However there are certain exceptions in which no consent is required:

- For the sole purpose of carrying out communication over an electronic communications network; or
- Where such storage or access is strictly necessary for the provision of an information society service requested by the subscriber or user.

This flexibility was built into the Directive to enable certain common sense activities to continue without the need to gain either implied or specific consent. However some parties have tried to argue in favor of stretching the meaning of the term 'strictly necessary'. The regulators are aware of this, which is why the International Chamber of Commerce (ICC) in the UK has advocated a concise cookie classification framework. The idea behind this is to establish a cookie hierarchy that identifies which cookies are strictly necessary, but also which are more intrusive.

The following categories were identified by the ICC (more info see here: ICC Cookie Guide, 04/12), they serve as guidance, and may be developed or changed in the coming months. For other countries we are still missing the detailed implementation guidelines from the local regulators, thus we currently present the UK interpretation only.

2.2.6 Strictly Necessary Cookies

This category refers to cookies that from a user perspective:

" (...) are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided." (ICC Cookie Guide, 04/12, p. 7)

These cookies are very narrowly defined and the reason for this is that in the EU Directive it is made clear that for the strictly necessary cookies there is no user consent necessary. This means these cookies are basically exempt from the impact of the regulation, hence the very narrow definition. This means that only a very small amount of the cookies you use will fall into this category!

2.2.7 Performance Cookies

Performance cookies are equally described in narrow terms, again making sure that the EU Directive, respectively its implementation in local law, can really serve the purpose it was originally invented for: Transparency for the user!

Thus performance cookies:

" (...) collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works." (ICC Cookie Guide, 04/12, p. 8)

This for example may relate to cookies used for a/b testing on the website, or for handing over information from one site to the next to ensure a consistent user experience. Additionally the ICC

Affilinet answers:

When providing its service, affilinet does not track, gather or analyze user behavior. Affilinet only records anonymous data. According to the ICC Cookie Guide affiliate network cookies such as affilinet's, should be classified as Performance Cookies, some of the least intrusive.

Other countries regulators still have to publish detailed guiding principles on the implementation of the EU Directive. We suggest you always use the local interpretation, which might differ from the UK version.

suggests that cookies which “track effectiveness of pay-per-click and affiliate advertising” should be allocated into this category. However the ICC makes very clear that this only relates to pure affiliate cookies (e.g. that track the click to the completion of an action) and not retargeting cookies that might be used when using affiliate services.

2.2.8 Functionality Cookies

Functionality cookies are a category of cookies that are not related to advertising, but rather to improving the “functionality” of a website. As such the ICC defines this category as

“(…) These cookies allow the website to remember choices you make (such as your username, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.” (ICC Cookie Guide, 04/12, p. 8)

This 3rd category is purely focused on the basic primary content of the site and its potential personalization, not the 3rd party content, e.g. advertising banners.

2.2.9 Targeting or Advertising Cookies

The last and more controversial category of cookies is the one named “Targeting or Advertising Cookies”. This is a little bit unfortunate as advertising does not necessarily relate to targeting, but as the discussion around Online Behavioral Targeting was the trigger for the new EU Privacy Directive, the regulator more or less subsumes all advertising cookies (except pure affiliate cookies) under this category.

The complete definition of the ICC is the following:

“(…) These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator’s permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.” (ICC Cookie Guide, 04/12, p. 8)

If you analyze the cookies on your site, you should consider using this classification too. The reason for this being that by applying this classification, you have the possibility of later on establishing a consent hierarchy, as for example British Telecom in their implementation of the EU Directive have done (see more here: <http://www.bt.co.uk/>) in the UK. Instead of forcing the customer to say yes or no to all cookies, BT chose to cluster their cookies into the above mentioned categories and allows the user to consent on a category level only. This makes it easy for the user to understand what the cookies are doing and offers you as a website a more pragmatic approach to deal with consent.

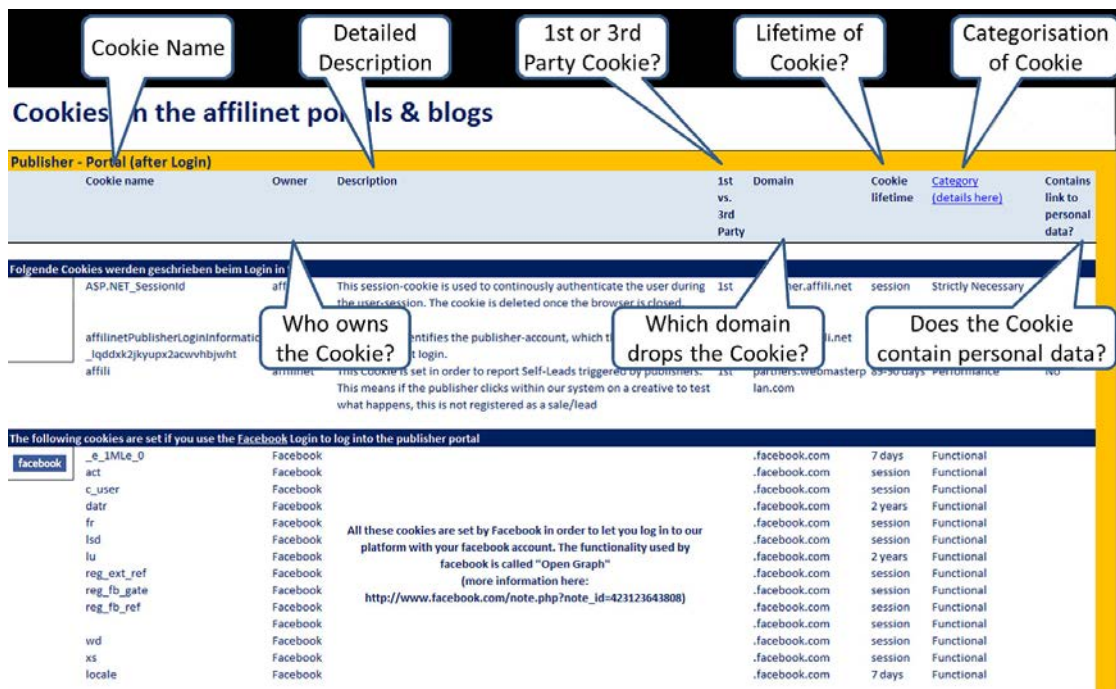
3. Completing a Cookie Audit

In order to classify your cookies and work out where they sit in the hierarchy previously identified, it is recommended that you complete a comprehensive cookie audit. What does this include (taken from the ICO Guide: “Guidance on the rules on use of cookies and similar technologies”, V3, p. 16)?

- Identify which cookies are used on or through your website
- Confirm the purpose(s) of each of these cookies
- Confirm whether you link cookies to other information held about users - such as usernames
- Identify what data each cookie holds
- Confirm the type of cookie – session or persistent
- If it is a persistent cookie, how long is its lifespan
- Is it a first or third party cookie? If it is a third party cookie who is setting it?
- Double check that your privacy policy provides accurate and clear information about each cookie

It is important that you consider ALL cookies that get set when a user visits your website(s) (see Figure 3) e.g. public areas, login areas and blogs. This process will not just help you on your way to becoming compliant with the Directive (showing you have done due diligence) but may also highlight any 3rd party code/technology you no longer need, potentially reducing loading times.

Figure 3 – Cookie Audit Excel (example) 



Cookie name	Owner	Description	1st vs. 3rd Party	Domain	Cookie lifetime	Category (details here)	Contains link to personal data?
Folgende Cookies werden geschrieben beim Login in							
ASP.NET_SessionId	affilinet	This session-cookie is used to continuously authenticate the user during the user-session. The cookie is deleted once the browser is closed.	1st	affilinet.affilinet	session	Strictly Necessary	
affilinetPublisherLoginInformation	affilinet	Identifies the publisher-account, which is used for login.	1st	affilinet.affilinet	session	Strictly Necessary	
affilinet	affilinet	This cookie is set in order to report Self-Leads triggered by publishers. This means if the publisher clicks within our system on a creative to test what happens, this is not registered as a sale/lead	1st	partners.webmasterplan.com	30 days	Performance	
The following cookies are set if you use the Facebook login to log into the publisher portal							
facebook	Facebook	All these cookies are set by Facebook in order to let you log in to our platform with your facebook account. The functionality used by facebook is called "Open Graph" [more information here: http://www.facebook.com/note.php?note_id=423123643808]		.facebook.com	7 days	Functional	
_e_1MLe_0	Facebook			.facebook.com	session	Functional	
act	Facebook			.facebook.com	session	Functional	
c_user	Facebook			.facebook.com	session	Functional	
datr	Facebook			.facebook.com	2 years	Functional	
fr	Facebook			.facebook.com	session	Functional	
lsd	Facebook			.facebook.com	session	Functional	
lu	Facebook			.facebook.com	2 years	Functional	
reg_ext_ref	Facebook			.facebook.com	session	Functional	
reg_fb_gate	Facebook			.facebook.com	session	Functional	
reg_fb_ref	Facebook			.facebook.com	session	Functional	
wd	Facebook			.facebook.com	session	Functional	
xs	Facebook			.facebook.com	session	Functional	
locale	Facebook			.facebook.com	7 days	Functional	

Source: affilinet GmbH

4. Affilinet Cookie Specifications

In order to support the completion of our clients cookie audits the below specification has been compiled; this provides an in-depth overview of what data affilinet's cookies store.

affilinet advertiser and publisher cookies								
Cookie name	Owner	Description	1st vs. 3rd Party	Domain	Cookie lifetime	Category (details here)	Contains personal data?	
Germany								
affili_0	affilinet	This cookie contains the last clicktime and a session ID	3rd	http://webmasterplan.com	180 days	Performance	No	
ASP.NET_SessionId	affilinet	The main function of the cookie is to maintain the session to our server	3rd	http://partners.webmasterplan.com	session	Performance	No	
affili_XXXX (xxxx = Program ID)	affilinet	The main function of the cookie is to identify the publisher which has arranged the sale/lead/transaction	3rd	http://partners.webmasterplan.com http://banners.webmasterplan.com	30 days -/+ x	Performance	No	
affili_XXXXpv (xxxx = Program ID)	affilinet	The main function of the cookie is to identify the publisher which has arranged the sale/lead/transaction (eReach)	3rd	http://partners.webmasterplan.com	30 days -/+ x	Performance	No	
France								
affili_0	affilinet	This cookie contains the last clicktime and a session ID	3rd	http://reussissonsensemble.fr	180 days	Performance	No	
ASP.NET_SessionId	affilinet	The main function of the cookie is to maintain the session to our server	3rd	http://clic.reussissonsensemble.fr	session	Performance	No	
affili_XXXX (xxxx = Program ID)	affilinet	The main function of the cookie is to identify the publisher which has arranged the sale/lead/transaction	3rd	http://clic.reussissonsensemble.fr http://banniere.reussissonsensemble.fr	30 days -/+ x	Performance	No	
affili_XXXXpv (xxxx = Program ID)	affilinet	The main function of the cookie is to identify the publisher which has arranged the sale/lead/transaction (eReach)	3rd	http://clic.reussissonsensemble.fr http://banniere.reussissonsensemble.fr	30 days -/+ x	Performance	No	
UK								
affili_0	affilinet	This cookie contains the last clicktime and a session ID	3rd	http://successfultogether.co.uk	180 days	Performance	No	
ASP.NET_SessionId	affilinet	The main function of the cookie is to maintain the session to our server	3rd	http://being.successfultogether.co.uk	session	Performance	No	
affili_XXXX (xxxx = Program ID)	affilinet	The main function of the cookie is to identify the publisher which has arranged the sale/lead/transaction	3rd	http://being.successfultogether.co.uk http://become.successfultogether.co.uk	30 days -/+ x	Performance	No	
affili_XXXXpv (xxxx = Program ID)	affilinet	The main function of the cookie is to identify the publisher which has arranged the sale/lead/transaction (eReach)	3rd	http://being.successfultogether.co.uk http://become.successfultogether.co.uk	30 days -/+ x	Performance	No	
Spain								
affili_0	affilinet	This cookie contains the last clicktime and a session ID	3rd	http://epartner.es	180 days	Performance	No	
ASP.NET_SessionId	affilinet	The main function of the cookie is to maintain the session to our server	3rd	http://web.epartner.es	session	Performance	No	
affili_XXXX (xxxx = Program ID)	affilinet	The main function of the cookie is to identify the publisher which has arranged the sale/lead/transaction	3rd	http://web.epartner.es http://program.epartner.es	30 days -/+ x	Performance	No	
affili_XXXXpv (xxxx = Program ID)	affilinet	The main function of the cookie is to identify the publisher which has arranged the sale/lead/transaction (eReach)	3rd	http://web.epartner.es http://program.epartner.es	30 days -/+ x	Performance	No	
Netherlands								
affili_0	affilinet	This cookie contains the last clicktime and a session ID	3rd	http://samenresultaat.nl	180 days	Performance	No	
ASP.NET_SessionId	affilinet	The main function of the cookie is to maintain the session to our server	3rd	http://zijn.samenresultaat.nl	session	Performance	No	
affili_XXXX (xxxx = Program ID)	affilinet	The main function of the cookie is to identify the publisher which has arranged the sale/lead/transaction	3rd	http://zijn.samenresultaat.nl http://worden.samenresultaat.nl	30 days -/+ x	Performance	No	
affili_XXXXpv (xxxx = Program ID)	affilinet	The main function of the cookie is to identify the publisher which has arranged the sale/lead/transaction (eReach)	3rd	http://zijn.samenresultaat.nl http://worden.samenresultaat.nl	30 days -/+ x	Performance	No	

Figure 4 – affilinet's tracking cookies – overview

Source: affilinet GmbH

This demonstrates why the UK's ICC has suggested affiliate network cookies should sit within the performance category, effectively one level away from strictly necessary. We do provide advertisers the service with our cookie of reimbursing the publishers and thus tracking the success of an advertising event.

Last but not least we apply the audit to our own tracking cookies (performance category) and recommend you copy and paste this information into your complete cookie audit, in case you use our tracking technology.

Figure 5 – Cookie Content – “affili_XXXX”

>> START Cookie Content <<

[1]	<i>ref</i>	=	[Publisher_CustomerID]
[2]	<i>&subid</i>	=	[a string which the publisher can define]
[3]	<i>&date</i>	=	[Clickdate]
[4]	<i>&cltime</i>	=	[Click time and -date]
[5]	<i>&linkType</i>	=	[Creative Type]
[6]	<i>&linkNb</i>	=	[Creative ID]
[7]	<i>&h1</i>	=	[Hash of RequestHeader, MD5 encrypted]
[8]	<i>&h2</i>	=	[Hashvalue of UserAgent, MD5 encrypted]
[9]	<i>&oldcltime</i>	=	[Clicktime of the previous publisher]
[10]	<i>&oldref</i>	=	[the previous publisher id]
[11]	<i>&OldPublisherIDs</i>	=	[the last five previous publisher]

>> END Cookie Content <<

Source: affilinet GmbH

The basic cookie name is very simple and contains our company name (“affili”) plus the Program ID with 4 numbers (e.g. affili_0000). Lines [1] – [8] contain the ID of the publisher, the click-date of when the creative last clicked on that publisher site, the concrete time of the click, the type of creative (e.g. banner) used and the specific ID of the creative in our network, plus with [6] and [7] a completely hashed (i.e. not readable anymore) and not reversible info about the UserAgent (e.g. Browser version, device name, operating system) and a similarly hashed info about the Header (Information sent as part of the request to the server).

Lines [9] – [11] enable us to tell the advertiser and publishers in the end whether they alone were attributing to a sale or whether before them the creative was clicked on other publisher sites. This plays a big role in the discussion around attribution of payment to the right sites and publisher models.

However if you look into our cookie you will only see numbers [9] – [11] if you clicked on the same creative twice on different publisher sites. Otherwise our cookie ends after number [8].

The duration of an affilinet tracking cookie is set per default to 30 days, but every advertiser can change this setting in his program settings. Our cookies are all classified as performance cookies according to the latest definition of the ICO as discussed above. **Our cookies do not contain personal data.**

In addition to the information listed above, the publisher has the possibility to transmit additional information to identify and cluster his transactions, e.g. for statistical purposes.

Additionally to the affili_xxxx cookie we use another cookie called ASP_NET_SessionID. This cookie’s main function is to maintain the session to our server during the time the browser session is active. The cookie is deleted as soon as the browser is closed. The cookie does not contain any personal situation and is considered *strictly necessary*

affilinet is very transparent even down to the content of its cookie. In most other cookies in the online universe you will find completely hashed content. We think that the transparent route is part of educating the market and helping users make informed decisions in the online world.

Please also refer to the FAQs of this document (see next page) as they might contain very valuable information that your compliance team usually requests.

Contact Us

If you have any questions regarding how the ePrivacy Directive and how it concerns the usage of affilinet’s technology, please don’t hesitate to contact us via this email address: privacy@affili.net. Alternatively you can always contact your account manager or approach the authors of this paper directly.

5. FAQ

Question	Answer
Why does affilinet use cookies?	affilinet uses cookies to anonymously track and record online userinteractions on our customers' websites when the traffic originatesfrom an affilinet publisher. The information is used in order to anonymously attribute the sale and the payment of the publisher fee to the correct publishers.
In which country do you save the data?	The data transferred is saved to servers in our German data center.
How long does affilinet save the cookies?	The default lifetime of affilinet cookies is 30 days, but the advertiser can request a longer or shorter duration if they require it.
Which kind of technology do you use for data transmission? (e.g. Cookie, Pixel with parameter, flash-cookie, etc.)	affilinet uses client or server-side code (e.g. javascript) to place and read cookies or process tracking pixels (tracking beacon) for the purpose of conversion tracking. If needed conversion data can be transmitted to the advertiser via our API or Batch-Method.
Where is affilinet integrated on the advertiser website?	The affilinet conversion tracking pixel is typically integrated at the end of the order cycle on the order confirmation page of the advertiser's shop. It is only if the advertiser allows retargeting, that other pages from the advertiser might be affected, depending on the individual configuration.
Why do you save the cookie data?	The cookie data is saved solely to anonymously track user interactions on our publisher and advertiser sites to guarantee payment between our publishers and advertisers. We do not identify users, we only identify publishers (websites).
Does affilinet use 3rd party providers for providing tracking services? E.g. tagman, etc.	affilinet only uses its own technology to provide customers with core services (tracking, creative delivery and payment). In the case of fingerprint tracking, we can revert to external providers of such services. In case of retargeting we offer our customers access to those technologies through our container technology.
What happens with affilinet's tracking if the browser is set on "Do not track"	Currently affilinet does not respect the Do Not Track header as the latter is currently not an official W3C standard. If the DNT header becomes an official W3C standard, affilinet will of course comply.
Statement to the storage of IP addresses and cookies	affilinet only uses the IP addresses of end-users in the context which is necessary for its proper business scope and execution and solely if permitted by law and compatible with data protection principles. affilinet does not use and collect cookies and IP addresses for the analysis of behaviour of end-users or to create user profiles.

Do you use Google Analytics in conjunction with your own affilinet tracking technology?	affilinet does not use Google Analytics in combination with any of our tracking technologies used to collect data. Client scripts are currently not used to collect data (except for retargeting – also depending on retargeting provider).
When using a retargeting publisher is any personal information saved about the user, e.g. the IP address?	affilinet does not store or forward any personal information in the context of retargeting.
Does affilinet use session tracking?	affilinet does have a session cookie called ASP.NET, this cookie just lasts for a session and expires when the browser is closed. It does not contain personal information.

6. Further Information

The following external documents provide you with a snapshot of the current discussion around the EU Privacy Directive in the different European countries.

6.1 affilinet insights:

- affilinet Whitepaper on EU Privacy Directive (see affilinet portal)
- affilinet’s own “About Cookies” page (see affilinet portal)
- affilinet’s Blog (www.affilinet-inside.com and www.affilinet-inside.de and www.affilinet-inside.fr), here we will discuss further developments on the privacy front and keep you updated on necessary next steps.

6.2 Across Europe:

- IAB (Interactive Advertising Bureau) Europe: “What are cookies and how do they work” (<http://goo.gl/pdBQh>)
- IAB Europe: “All about cookies” a website to your favorite sweets (<http://goo.gl/Jy8N1>)

6.3 For the UK:

- -CC UK (International Center of Commerce) “Cookie Guide” (<http://goo.gl/IRBQL>)
- IAB UK: “Performance Marketing & Cookies explained” (<http://goo.gl/ho7M4>)

6.4 For the Netherlands:

- SOLV Advocates: “Cookies under Control” (<http://goo.gl/PLCRj>)

6.5 Request for more information:

If you feel you need to know even more about us, our business, cookies, or any of the issues discussed here feel free to get in touch (privacy@affili.net) at any time.