

# Cookie Policy

Last updated: 18 April 2026

Effective date: 18 April 2026

This Cookie Policy explains how **Cumulus Neuroscience Limited** (company number NI628481, registered office Concourse 3, Unit 5, Queens Road, Belfast, BT3 9DT) (“we”, “us”, “our”) uses cookies and similar technologies (such as pixels, tags, and local storage) on our website.

This Cookie Policy should be read together with our Website Privacy Policy, which explains how we process personal data more generally, including any personal data collected through cookies.

By continuing to use our website, you agree to the placement of strictly necessary cookies. Non-essential cookies (analytics, functional, and marketing) will only be placed where you have given your consent via our cookie banner.

## 1. What are cookies?

Cookies are small text files placed on your device (computer, tablet, or mobile phone) when you visit a website. Cookies are widely used to make websites work, to improve performance, and to provide information to website owners.

We also use similar technologies such as pixels, web beacons, tags, and local or session storage. In this policy, we refer to all of these collectively as “cookies”.

Cookies may collect information such as your IP address, browser type and version, operating system, device identifiers, referring URL, pages visited, and how you interact with our website. Some of this information constitutes personal data under the UK General Data Protection Regulation (UK GDPR) and EU General Data Protection Regulation (EU GDPR), and is processed in accordance with our Website Privacy Policy.

## 2. Categories of cookies we use

We use the following categories of cookies:

### 2.1 Strictly Necessary Cookies

These cookies are essential for our website to function and for us to provide services you have requested. Without them, the website cannot operate properly. Examples include cookies that manage your session, authenticate you on secure areas, or remember your cookie preferences.

These cookies are exempt from the consent requirement under Regulation 6(4) of the Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended) (“PECR”), because they are strictly necessary for the provision of a service explicitly requested by you.

### 2.2 Analytics / Performance Cookies

These cookies help us understand how visitors interact with our website so that we can measure and improve its performance. They may collect information such as pages visited, time spent on pages, traffic sources, device and browser type, and approximate geographic location (derived from IP address).

We only place these cookies where you have given consent via our cookie banner.

### 2.3 Functional Cookies

These cookies allow our website to remember choices you make (such as language or display preferences) and provide enhanced features. They are not strictly necessary but improve your experience.

We only place these cookies where you have given consent via our cookie banner.

### 2.4 Marketing Cookies

These cookies may be used to:

- Track engagement with marketing content
- Measure the effectiveness of our marketing campaigns

- Support retargeting and advertising across third-party platforms
- Manage your communication preferences

We only place these cookies where you have given consent via our cookie banner.

### 3. Cookies currently used on our website

The table below lists the specific cookies used on our website. This table is maintained by us and updated periodically. Where the table is incomplete or out of date, we will correct it as soon as reasonably practicable.

[Note to Cumulus web team: populate with actual cookies deployed on cumulusneuro.com — the rows below are indicative examples only and must be verified / replaced before publication.]

Cookie Name	Provider	Purpose	Category	Duration
__cfuid	Cloudflare	Set by HubSpot's CDN provider because of their <a href="#">rate limiting policies</a> . It expires at the end of the session. Learn more about <a href="#">Cloudflare cookies</a> .	Strictly Necessary	Session
__cfuid	Cloudflare	This cookie is set by HubSpot's CDN provider because of their <a href="#">rate limiting policies</a> . It expires at the end of the session. Learn more about <a href="#">Cloudflare cookies</a> .	Strictly Necessary	Session
__cf_bm	Cloudflare	This cookie is set by HubSpot's CDN provider and is a necessary cookie for bot protection. It expires in 30 minutes. Learn more about <a href="#">Cloudflare cookies</a> .	Strictly Necessary	30 mins
__hs_cookie_cat_pref	HubSpot	This cookie is used to record the categories a visitor consented to. It contains data on the consented categories.	Strictly Necessary	6 months
__hstc	HubSpot	It contains the domain, hubspotutk, initial timestamp (first visit), last timestamp (last visit), current timestamp (this visit), and session number (increments for each subsequent session).	Analytics	6 months
hubspotutk	HubSpot	This cookie keeps track of a visitor's identity. It is passed to HubSpot on form submission and	Analytics	6 months

Cookie Name	Provider	Purpose	Category	Duration
		used when deduplicating contacts. It contains an opaque GUID to represent the current visitor.		
__hssc	HubSpot	This cookie keeps track of sessions. This is used to determine if HubSpot should increment the session number and timestamps in the __hstc cookie. It contains the domain, viewCount (increments each pageView in a session), and session start timestamp.	Analytics	30 minutes
__hsrc	HubSpot	Whenever HubSpot changes the session cookie, this cookie is also set to determine if the visitor has restarted their browser. If this cookie does not exist when HubSpot manages cookies, it is considered a new session. It contains the value "1" when present.	Analytics	Session
__secure-BUCKET	Google	Set by Google because we use their plugins reCAPTCHA and Google Translate. Only set if you are logged into your Google account (so log out of your account to stop them from being set). Some are used for security and others are used to help customise adverts on Google properties, such as Google Search (you will have agreed to this arrangement as part of signing up for a Google account). More information: <a href="https://policies.google.com">policies.google.com</a>		
__secure-ENID	Google	Set by Google because we use their plugins reCAPTCHA and Google Translate. Only set if you are logged into your Google account (so log out of your account to stop them from being set). Some are used for security and others are used to help customise adverts on Google		

Cookie Name	Provider	Purpose	Category	Duration
		properties, such as Google Search (you will have agreed to this arrangement as part of signing up for a Google account). More information: <a href="https://policies.google.com">policies.google.com</a>		
AEC	Google	Set by Google because we use their plugins reCAPTCHA and Google Translate. Only set if you are logged into your Google account (so log out of your account to stop them from being set). Some are used for security and others are used to help customise adverts on Google properties, such as Google Search (you will have agreed to this arrangement as part of signing up for a Google account). More information: <a href="https://policies.google.com">policies.google.com</a>		
DV	Google	Set by Google because we use their plugins reCAPTCHA and Google Translate. Only set if you are logged into your Google account (so log out of your account to stop them from being set). Some are used for security and others are used to help customise adverts on Google properties, such as Google Search (you will have agreed to this arrangement as part of signing up for a Google account). More information: <a href="https://policies.google.com">policies.google.com</a>		
_ga	Google Analytics	Distinguishes unique users	Analytics	2 years
_ga_<ID>	Google Analytics	Persists session state (GA4)	Analytics	2 years
_gid	Google Analytics	Distinguishes users (daily)	Analytics	24 hours
_gat*	Google Analytics	To read and filter requests from bots.	Functional	1 minute
_gat_gtag_UA*	Google Analytics	To store a unique user ID	Analytics	1 minute

## 4. Third-party cookies and recipients

Some cookies are set by third-party service providers whose services we use on our website. These third parties may act as independent data controllers, joint controllers, or as our processors, depending on the service.

The third parties whose cookies may be placed on our website include:

- **Google LLC / Google Ireland Limited** – for website analytics (Google Analytics 4). See <https://policies.google.com/privacy>
- **HubSpot Inc.** – for marketing analytics, CRM integration, content management system and form submissions. See <https://legal.hubspot.com/privacy-policy>
- **LinkedIn Ireland Unlimited Company** – for conversion tracking and advertising. See <https://www.linkedin.com/legal/privacy-policy>
- **Cloudflare** – for bot protection and rate limiting. See <https://www.cloudflare.com/en-gb/privacypolicy/>

We review the third parties we engage and ensure that, where they act as our processors, they are bound by a written data processing agreement meeting the requirements of Article 28 UK GDPR / EU GDPR.

## 5. International transfers

Some of the third-party providers listed above are located outside the United Kingdom and the European Economic Area (EEA), including in the United States. Where cookie data is transferred outside the UK or EEA, we rely on one or more of the following safeguards under Chapter V of the UK GDPR and EU GDPR:

- The UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses;
- The European Commission's Standard Contractual Clauses (SCCs);
- The UK Extension to the EU-US Data Privacy Framework, where the recipient is certified under that framework;
- Any adequacy decision in force at the relevant time.

Further information on the safeguards applied to any specific transfer is available on request from our Data Protection Officer (see Section 10).

## 6. Lawful basis

Our use of cookies is governed by both PECR and the UK GDPR / EU GDPR:

- **Strictly necessary cookies** – placed without consent in reliance on the exemption in Regulation 6(4) PECR. Any personal data collected through these cookies is processed on the basis of our legitimate interests in operating a secure and functional website (Article 6(1)(f) UK GDPR / EU GDPR).
- **Analytics, functional, and marketing cookies** – placed only with your consent (Regulation 6(1) PECR). Consent is also our lawful basis under Article 6(1)(a) UK GDPR / EU GDPR for any resulting processing of personal data.

You may withdraw your consent at any time, as described in Section 7. Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

## 7. How you can control cookies

When you first visit our website, you will be presented with a cookie banner that allows you to:

- Accept all cookies;
- Reject all non-essential cookies; or
- Manage your cookie preferences on a granular basis (by category).

The “Reject All” option is presented with equal prominence to the “Accept All” option. No non-essential cookies are placed until and unless you have given consent.

You can withdraw or change your consent at any time by clicking the “**Cookie Settings**” link in the footer of our website, which will reopen the preference centre.

You can also control cookies through your browser settings. Most browsers allow you to view, manage, delete, and block cookies. Please note that disabling strictly necessary cookies may affect the functionality of our website.

Guidance on managing cookies in common browsers is available at:

- <https://support.google.com/chrome/answer/95647> (Chrome)
- <https://support.mozilla.org/en-US/kb/cookies> (Firefox)
- <https://support.apple.com/en-gb/guide/safari/sfri11471/> (Safari)
- <https://support.microsoft.com/en-us/microsoft-edge> (Edge)

## 8. Retention of cookie data

Cookies are stored for different durations depending on their purpose, as shown in the table in Section 3. In general:

- **Session cookies** are deleted when you close your browser.
- **Persistent cookies** remain on your device until they expire or until you delete them.

Where personal data collected via cookies is retained beyond the cookie’s own lifespan (for example, in our analytics or CRM systems), the retention periods set out in our Website Privacy Policy apply.

## 9. Your rights

Where cookies collect personal data, you have rights under the UK GDPR and EU GDPR, including:

- The right to access your personal data;
- The right to rectification of inaccurate data;
- The right to erasure (“right to be forgotten”);
- The right to restrict or object to processing;
- The right to data portability;
- The right to withdraw consent at any time;
- The right to lodge a complaint with a supervisory authority.

In the United Kingdom, the relevant supervisory authority is the Information Commissioner’s Office (ICO), <https://ico.org.uk>. In the Republic of Ireland, it is the Data Protection Commission (DPC), <https://www.dataprotection.ie>. Visitors located elsewhere in the EEA may contact their local supervisory authority.

For more information on how to exercise your rights, please see our Website Privacy Policy or contact our Data Protection Officer (Section 10).

## 10. Children

Our website is not directed at children. We do not knowingly place non-essential cookies on the devices of children under the age of 13 in the UK, or under the applicable digital consent age in the relevant EU member state (typically 16, but between 13 and 16 depending on the jurisdiction). If you believe a child has provided consent through our website, please contact our Data Protection Officer and we will take appropriate steps.

## 11. Changes to this Cookie Policy

We may update this Cookie Policy from time to time to reflect changes in the cookies we use, in applicable law, or in our practices. Any updates will be published on this page with a revised “Last

updated" date. Where changes are material, we will take reasonable steps to bring them to your attention (for example, by requesting renewed consent via the cookie banner).

## 12. Contact us

If you have any questions about this Cookie Policy or our use of cookies, please contact:

**Data Protection Officer**

**Cumulus Neuroscience Limited**

Concourse 3, Unit 5, Queens Road

Belfast, BT3 9DT

United Kingdom

Email: [dpo@cumulusneuro.com](mailto:dpo@cumulusneuro.com)

Company number: NI628481 (registered in Northern Ireland).