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Introduction

Verint's Enterprise Feedback Management ("EFM") Survey tools offer a flexible solution to gain customer and enterprise feedback through a web browser interface. Like most modern browser technologies, Verint EFM surveys use “cookies” to facilitate a user's experience in relation to the survey created using the Verint EFM survey tools.

What are “Cookies”?

A cookie is a digital file, typically made of up letters and numbers, which is stored on a device connected to a web browser page. Cookies allow a website to recognize a user’s device.

Legal Requirements for Cookies

An operator of a website will need to ensure that it is compliant with the law applicable to the jurisdiction where the website can be accessed. Many jurisdictions impose a range of legal requirements on the operator of a website where that web-site is either available for public access or may be accessed by a person acting as a consumer.

While there is less legal regulation of non-public and non-consumer websites such as corporate intranet sites, it is the responsibility of the operator of any website, internal or external, to ensure compliance with the laws applicable to that website.

The Verint EFM survey tool can be implemented in a number of ways using standard features. As such, Verint has no control over the precise sequence and functionality of the EFM survey established and who may be directed to a website constructed using the Verint EFM Survey solution.

This document is intended to deal with the impact of new laws which came into force in the European Union1 and specifically as those laws apply to the United Kingdom. European Directive 2009/136/EC2 required member states to adopt domestic laws by 25 May 2011. The United Kingdom enacted The Electronic Communications (EC Directive) Privacy Regulations 20113 (which will be referred to in this document as the “Cookie Regulations”).

The Cookie Regulations state that use of cookies is only permitted if the user of the website:

- Has been provided with clear and comprehensive information about the purposes for which the cookie is stored and accessed; and
- Has given his or her consent (subject to certain limited exceptions).

The UK Information Commissioner’s Office has published a Cookie Guide4.

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Cookies used by Verint EFM Survey Web Pages

The following cookies are used by Verint EFM Survey Pages:

<table>
<thead>
<tr>
<th>Cookie Function</th>
<th>Applies to</th>
<th>Cookie Type</th>
<th>Cookie Regulation Requirements</th>
</tr>
</thead>
</table>
| Performance     | Any Survey | Session Cookie       | 1. Requires clear and comprehensive information about the purposes of the cookie  
|                 |            |                      | 2. Does not require explicit consent                             |
| Load Balancing  | Any Survey | Session Cookie       | 1. Requires clear and comprehensive information about the purposes of the cookie  
|                 |            |                      | 2. Does not require explicit consent                             |
| Participation   | Open Participation Survey w/ ‘Prevent Updates’ flag set | Persistent Cookie (1 Year) | 1. Requires clear and comprehensive information about the purposes of the cookie  
| Control: prevents user from submitting multiple surveys |            |                      | 2. Requires explicit consent                                     |
| Polls           | Polls      | Persistent Cookie (90 Days) | 1. Requires clear and comprehensive information about the purposes of the cookie  
<p>|                 |            |                      | 2. Requires explicit consent                                     |</p>
<table>
<thead>
<tr>
<th>Cookie Function</th>
<th>Applies to</th>
<th>Cookie Type</th>
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</tr>
</thead>
</table>
| Intercept Survey: manages display of intercept offer to ensure offer appears in the right circumstances | Intercept Survey | Persistent Cookie (30 Days) | 1. Requires clear and comprehensive information about the purposes of the cookie  
2. Requires explicit consent |

Cookies utilized by Verint EFM Surveys standard style sheets do no record personal information about the user. Any personal data captured e.g. as part of field responses or free format text, may be subject to additional legal requirements about the protection of personal data for which the operator of the Survey is responsible. The persistent cookies are only used to prevent retaking of open participation surveys. The other surveys all have a unique link per participant and do not use cookies.

If a user of Verint EFM Surveys disables cookies on it's browser before or after commencing the Survey, the usage of the Survey may be affected. If persistent cookies are deleted after completion of the Survey, the user may be permitted to take the survey again.

### Example Solutions

Verint EFM Survey tools allows style sheets to be utilized in order to construct surveys. These may be configured in order to establish an implementation which is compliant with the Cookie Regulation. Below are several suggested ways in which surveys can be configured to be compliant with the Cookie Regulations but there are other possible solutions. The descriptions of the cookies above provide clear and comprehensive information about each cookie.

**Open Participation Surveys:**

There are multiple approaches that could be applied to ensure a user has provided consent before the participation control cookie is used. A few are described here. Customers of Verint EFM Surveys may want to engage with Verint professional services for more advanced implementations.

By placing the survey in a section of the website that’s accessible only to users that have already provided consent, the site’s existing disclosure and consent mechanism can be applied.

Alternatively, features of the survey can be used to provide disclosure and consent. Some simple and effective options are:

- Open the survey with a text block on the first page with notification messaging about use of cookies and instructions that the user can close the browser to opt out or click Next to grant acknowledgment of cookie usage  
- Notification of cookie usage with a Choose Many question as the first question in the survey with a single choice that has to be selected to continue on with the survey  
- Edit the survey template to include notification messaging and option to dismiss the message
**Polls and Intercept Surveys:**

These features work by providing a code snippet to be embedded in the website. In most cases the website will already be configured with a cookies disclosure and consent opt-in. The website should be configured so that these features are only available to users that have provided consent.

**Additional Professional Services Support**

Verint is able to offer professional services to assist its customers to review and if necessary amend existing implementation of the Verint EFM Survey solution in order to alter style sheets and information presented to the user in order to implement their own compliance model. This service is chargeable and your Verint Sales Account Executive would be pleased to help with this arrangement.

**Legal Notice**

This document is not a substitute for seeking professional advice or services from legal counsel and other professional advisors, nor should it be used as a basis for any decision or action that may affect the recipient’s or reader’s business. Before making any decision or taking any action that may affect your business, you should consult a qualified professional advisor as it relates to your specific circumstances.

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All users of Verint solutions and operating websites which utilize Verint EFM including surveys, must be satisfied that the implementation is compliant with the laws of the relevant jurisdiction in which the solution operates. This applies irrespective of whether the Verint solution is hosted by Verint or installed in operator’s own computer facility.

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**Document Version Control**

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