

Userlane Cookie Inclusion Policy

Last Modified on 31.03.2025

1. When Userlane Does Not Need to Be Included in a Cookie Policy

Userlane does not need to be included if:

- It is used **internally for software used by an organization's employees**
- It is used **externally in a B2B environment**, where the users are business users accessing software in a professional capacity.

Reason: In these cases, the use of cookies falls under corporate IT policies rather than consumer data protection regulations (e.g., GDPR).

2. When Userlane Must Be Included in a Cookie Policy

Userlane **must be included** in the cookie policy if:

- It is used in a **B2C (Business-to-Consumer) platform**, where the end-users are private individuals (not business users).

Reason: In B2C environments, consumers must be informed about cookies and tracking technologies under GDPR and similar regulations.

Note: Userlane places several cookies, and they should either all be set to "essential" or all to "functional", depending on whether Userlane is implemented to

- a. support regulatory duties, e.g. mandatory onboarding or training of functionalities related to security/privacy (**essential**) or
- b. is used for analytics only (**functional**)

3. Userlane as an Essential Cookie (No Opt-Out Required)

Userlane should be classified as an **essential cookie** (without opt-out) if:

- Both Userlane Guides and Analytics are used to comply with legal or regulatory requirements (e.g., GDPR, DORA) by training users in specific features related to compliance, such as setting up 2FA or guiding them through critical workflows.

Reason: Essential cookies are required for the platform to meet regulatory obligations, and user consent is not required for their use.

4. Userlane as a Functional Cookie (Opt-Out Required)

If Userlane is used only for analytics purposes, it should be categorized as a functional cookie, requiring user consent with an opt-out option.

Action:

- The cookie policy should state that users can opt out of Userlane analytics tracking.
- Implement the process outlined in Annex 2 for enabling opt-out.

Reason: Functional cookies enhance user experience but are not necessary for the platform’s core functionality. Therefore, under GDPR, users must have the choice to opt out.

Note: Userlane sets several cookies. Opting out also disables the option to display Userlane guides or any other Userlane content in the application.

5. Userlane Is Not a Marketing Cookie

Userlane **must never be classified as a marketing cookie** as:

- It does not track users for advertising purposes.
- It does not collect or share data for remarketing or third-party ad platforms.
- It is used strictly for **platform guidance, usability, and analytics**.

Conclusion: Userlane is either an essential or functional cookie, never a marketing cookie.

Summary Table

Use Case	Include in Cookie Policy?	Cookie Category	Opt-Out Required?
Internal employee use (B2B, training, onboarding)	<input type="checkbox"/> No	Not applicable	Not applicable
External B2B use (business users, corporate software)	<input type="checkbox"/> No	Not applicable	Not applicable
B2C use (private individuals as end-users)	<input type="checkbox"/> Yes	Functional or Essential	Depends on category
Userlane used for regulatory compliance (e.g., GDPR, DORA)	<input type="checkbox"/> Yes	Essential	<input type="checkbox"/> No opt-out
Userlane used only for analytics	<input type="checkbox"/> Yes	Functional	<input type="checkbox"/> Opt-out required

A comprehensive list of Userlane cookies can be found [here](#).

Required Actions

- Evaluate if Userlane needs to be included in your cookie policy.
 - Ensure Userlane is correctly categorized in your cookie policy.
 - Include Userlane [cookie policy statement](#).
 - Implement [opt-out functionality](#) if Userlane is classified as a functional cookie.
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