COMMANDERS ACT

Realtime Cookie Scanner

Analyse cookies stored on your network in real time

January 2026
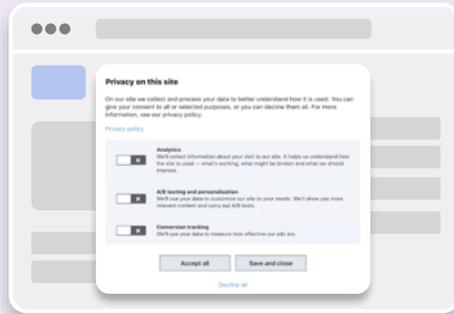
The problem

High risks

Complexity of websites

Constant doubt about GDPR compliance

Lack of suitable tools

Performance research

A dual compliance challenge

1 Establish initial consent collection
consent

2 ... and monitoring
compliance on a daily basis

Pop-in consent

Piggybacking
New cookies generated by second-level tags

Regular updates from partners

| New cookies | New cookie names | New tracking domains |

Dormant cookies
Not actively used by the team, they slip under the radar of manual audits

Technical cookies
linked to redirects, iframes or plugins, etc.

Rare or selective cookies
They are difficult to spot because they are set for **certain users only,** or under certain **specific conditions.**

A double level of risk

At the brand level

Heavy financial penalties

€20 million or 4% of global annual turnover

Damage to the brand's reputation

Loss of customer confidence, bad buzz, and negative media coverage

Class actions or individual complaints

Individual complaints to the CNIL or class actions via associations such as NOYB

Risk

At the digital team and DPO level

Civil liability or internal disciplinary action

if an employee, either intentionally or through negligence, violates GDPR obligations, they may be penalised

Personal criminal liability

unlawful collection of personal data, invasion of privacy, or failure to comply with a known legal obligation

Damage to reputation and career

Involvement in a data leak or poor GDPR management

Financial penalties that extend

Google
€150 million

Non-compliant cookie consent, absence of a refusal button equivalent to acceptance.

Meta
€60 million

Refusal of cookies more complex than acceptance, rendering consent invalid

orange™
€50 million

Displaying advertisements between emails without explicit user consent.

Carrefour
€2.25 million

Multiple breaches: insufficient information, excessive retention period, lack of fairness.

Carrefour banque et assurance
€800,000

Similar infringements to those committed by Carrefour France concerning the management of personal data.

...

Significant sums of money that do not only concern GAFAM

- Limited bandwidth
- Flaws in processes
- Daily life taking over
- Rapidly expanding websites
- An ever-increasing number of Adtech/Martech solutions
- A lack of solutions

Incidents that damage brands

Impact on consumer confidence and behaviour

75% Consumers say they would not buy from organisations they do not trust to protect their personal data.

3.6 of consumers say that a single data breach would negatively impact their likelihood of purchasing products from a company.

33 Of consumers would lose trust in an organisation that uses their data to offer products or services from another company

Measurable economic consequences

21 Of consumers have stopped using the services of a company that has suffered a data breach.

42 Of consumers have requested that their information be deleted after a data breach.

52 Of consumers would consider purchasing the same products or services from a supplier offering better security.

How can these risks be better managed?

Cookie

What's new?

- Real-time cookie detection
- List of new cookies and cookies previously approved by the customer
- Option to ignore certain cookies (test cookies, rare cookies, etc.)
- Real-time alerting if a new cookie is detected (Email, Slack, Teams, API, etc.)

Where

- Detection of the URL where the cookie was seen
- Detection of the domain where the cookie was scanned
- Detection of third-party cookies by identifying partner hits
- AI-assisted classification to categorise unknown cookies
- Detection of the URL that created the cookie

What impact?

- Label indicating whether a cookie is stored before consent
- Label indicating whether a cookie has disappeared (was detected but is no longer visible) = "missing" label
- Option to display/exclude cookies based on the desired detection percentage
- Update the cookie table on your legal page with a single click

Who?

- Pre-filling of the publisher partner's name, cookie description and categorisation (proprietary cookie database)
- Detection of cookie type: first-party cookie, third-party cookie, local storage, session storage
- Display of the lifetime of each cookie/storage
- Option to manually edit each cookie for a more customised description

Significantly more powerful technology

"Anything but a crawler"

Comprehensiveness
Rare, selective or temporary cookies.

Continuous monitoring
No need to wait for the next crawler to pass by

Immediacy
Real-time detection combined with alerting

Ultra-simple activation
No scenarios to define or maintain, 1-click implementation

Real users
In real conditions, not bots

Operational support

- **Simplified prioritisation**
  The frequency of occurrence of each cookie is known

- **Detection of conditional cookies**
  Cookies triggered by specific interactions or behaviours (scrolling, clicking, following a specific path)

- **No scenario creation or setup required**
  You monitor all the pages your visitors see: authenticated or dynamic pages, order funnel, forms, etc.

- **No technical maintenance over time**
  No need to keep test paths up to date every time the site changes

- **Enriched contextual analysis**
  Ability to know on what type of page or in what context the cookie was seen (e.g., cookie specific to conversion funnels)

- **Suitable for multi-region and multi-language sites**
  No need to define a crawl by domain or language

Enhanced operational efficiency

Secure digital activity

→ Technology that is much more powerful than crawls

→ Constant monitoring for better control

→ Enhanced protection that reassures DPOs and management

→ Documentation that is always up to date and ready in case of an audit

→ Truly one-click implementation

→ Controlled adoption costs

Thanks

Appendices

Features

- Filters by language, domain, cookie/storage type

- Real-time cookie detection

- Display of detection percentage

- Detection of the domain where the cookie was scanned

- Option to ignore certain cookies (manual deletion of test cookies, etc.)

- Display of a "scanned" (actually detected) or "inferred" label

- Option to manually edit each cookie

- Indication for each cookie whether it is a first-party, third-party, local storage, or session storage cookie

- Display of the lifetime of each cookie/storage

- Label indicating whether a cookie is stored before consent

- Label indicating whether a cookie has disappeared (was detected but is no longer visible) = "missing" label

- Option to display/exclude cookies based on detection percentage (with fine selection bar)

- Option to automatically translate into almost any language

- List of "new" cookies and (separate) list of cookies previously validated by the customer ("active")

- Display of the name of the partner responsible for creating this cookie (YouTube, Google, etc.)

- Creation of a ready-to-use "cookie table" to display on the client's website, available in all defined languages

- This table is dynamic and can be updated without modifying the source code of the customer's website

- Detection of the URL that created the cookie (e.g. a Google font)

- More efficient translations in all languages (thanks to JarvX)

- Detection of the full URL where the cookie was last seen

- Real-time alerting if a new cookie is detected

Screenshots

Realtime Cookie Scanner

Configuration

- Defining the website domain name

- Adding the desired languages

- Custom fields: create custom fields to add custom information to each cookie

Realtime Cookie Scanner

Available in all languages

- Specify the languages you require and our AI will take care of the translation

- All languages available

- No limit on the number of languages you can set

Cookie Notice Manager

Filters to improve searches

1. Defining the website domain name

2. Domain filters and storage type

3. Language selection

Realtime Cookie Scanner

Available in all languages

View the tracking table in the desired language

Real-time cookie scanner

Description of the cookie by our AI

A cookie with no visible description; use our AI to help you

Real-time cookie scanner

Real-time table

Data updated in real time

- Real-time table (no batches).

- Automatic detection and breakdowns by:

  - vendor,

  - category

  - domain

  - frequency

  - status

- Filters by domain, frequency, storage type

Real-time cookie scanner

Rare cookies

Set the desired detection percentage

For all types of cookies and storage, you can view the detection frequency percentage and customise it

Cookie categorisation
Validation, Editing, Exclusion

Cookies are organised into three lists

- **New**: recently detected, not reviewed.

- **Active**: validated by you, ready to be displayed in the notice.

- **Ignored:** place cookies here that you do not want to see listed in your cookie notice.

- Uses AI to find the description and category of rare cookies, with human validation

- Automatically classifies cookies by risk and frequency.

Modification of cookie descriptions

Cookie editing

Cookie editing possible by:

- Name
- Storage type
- Domain
- Duration
- Website
- Vendor URL
- Multi-language

Alert on newly detected cookies

Specify the sensitivity level of newly scanned cookies

Real-time alerts for newly scanned cookies:

- Instant notifications for new cookies, deleted cookies, or non-compliant cookies

- Configurable by domain, language, and severity

- Integrations: Email, Webhook, Slack, Teams

Cookie names and meanings

Display of cookies stored prior to consent

Scanned:
Detected during live user sessions

Before consent:
Cookie set before user consent.

Missing:
Not scanned for over a month

Exempted:
You can add an "exempted" flag. Simply activate the dedicated switch in "Cookie Edition" to classify exempted cookies.

Quick and easy deployment of the table

Publish a cookie table on your website

- Generate a version of your cookie policy

- Export a version of the cookie notice available in several versions

- Copy/paste the js code onto your legal page to automatically build the cookie list table. Implementation document.
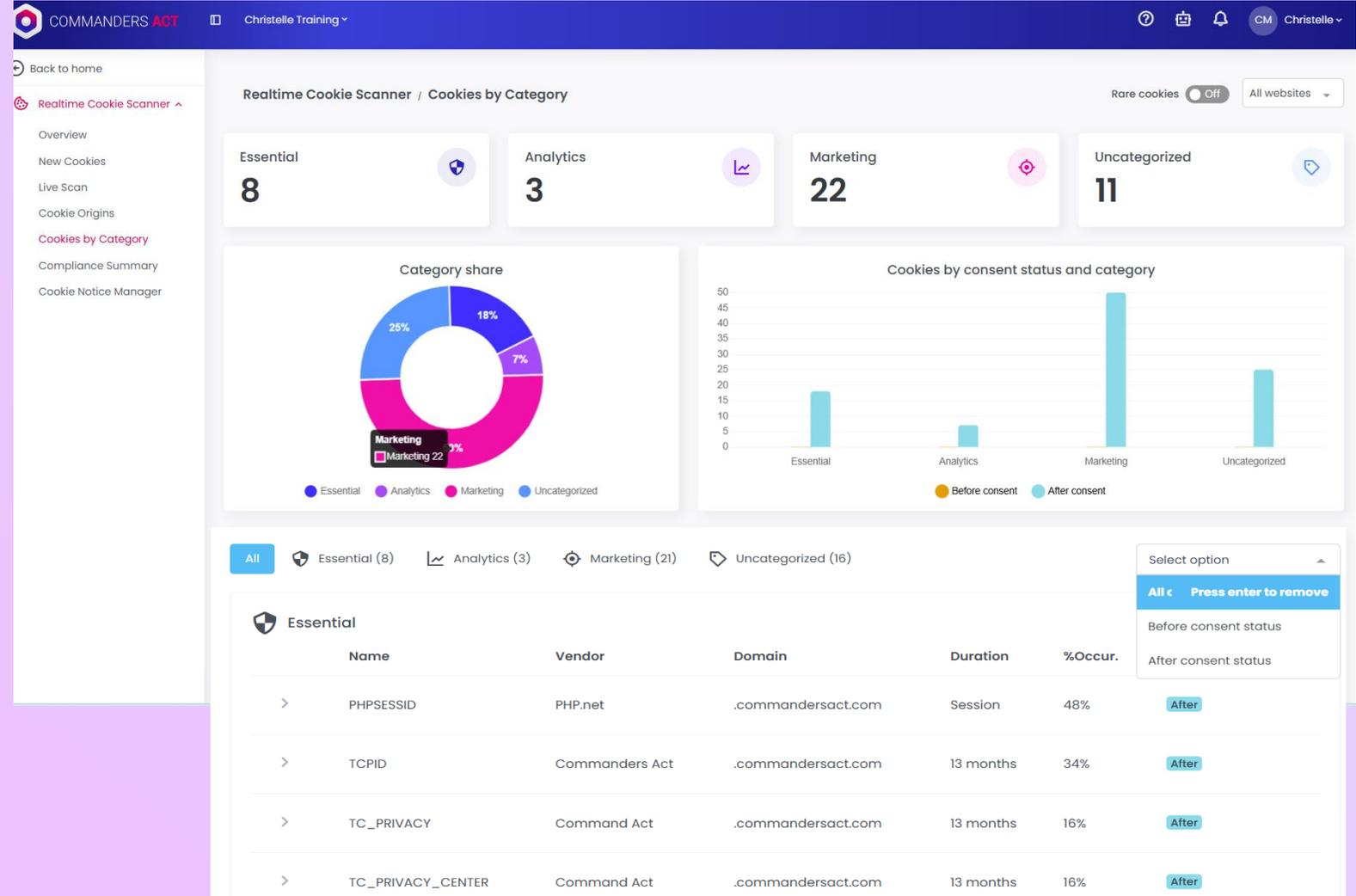
Cookie dashboard

Cookie dashboard by category

Observation:

- cookie volumes by category

- Cookies stored before or after consent

- List of cookies placed before or after consent

Context, opportunity & challenges

RCS: List of benefits

Benefits	Advantages
1. **Real and complete visibility of cookies through scanning**	No "hidden" cookies are missed.
2. **Continuous real-time monitoring**	Immediate response rather than delayed detection. Possible integrations: Email, Slack, Teams, Webhook
3. **Intelligent & enriched classification**	Clear understanding of the impact of each cookie without cumbersome manual analysis.
4. **Detection of all storage types**	This ensures comprehensive coverage of all client-side storage methods.
5. **Automation of cookie policy publication**	Transparent and compliant publication without manual effort.
6. **Rapid deployment independent of CMP/TMS**	Rapid and compatible implementation.

7. **Useful use cases for multiple teams**
• The module serves several cross-functional purposes:
   • Continuous compliance monitoring (e.g. CNIL/GDPR)
   • Immediate audit after deployment of tags or containers
   • Proactive detection of undeclared third-party scripts
   • Compliance monitoring during site redesigns or migrations
	A useful tool for privacy, marketing, legal and technical teams

8. **Live dashboards**	Quick visual monitoring without waiting for delayed reports

Coming Soon

Cookie Origins

The missing link between the script and the data.

The "Best Effort" approach A view based on real-time observation of the JavaScript stack. We capture the exact context at the moment the cookie is set.

What you gain in concrete terms:

- Visual mapping: Instantly visualise the Script → Cookie relationship.

- Third-party identification: Identify the active domains and scripts responsible for the placement.

- Diagnostic assistance: Pragmatic support to make your tags more reliable and facilitate communication with your partners.

A unique readability tool that complements the comprehensive analysis of Realtime Cookie Scanner.
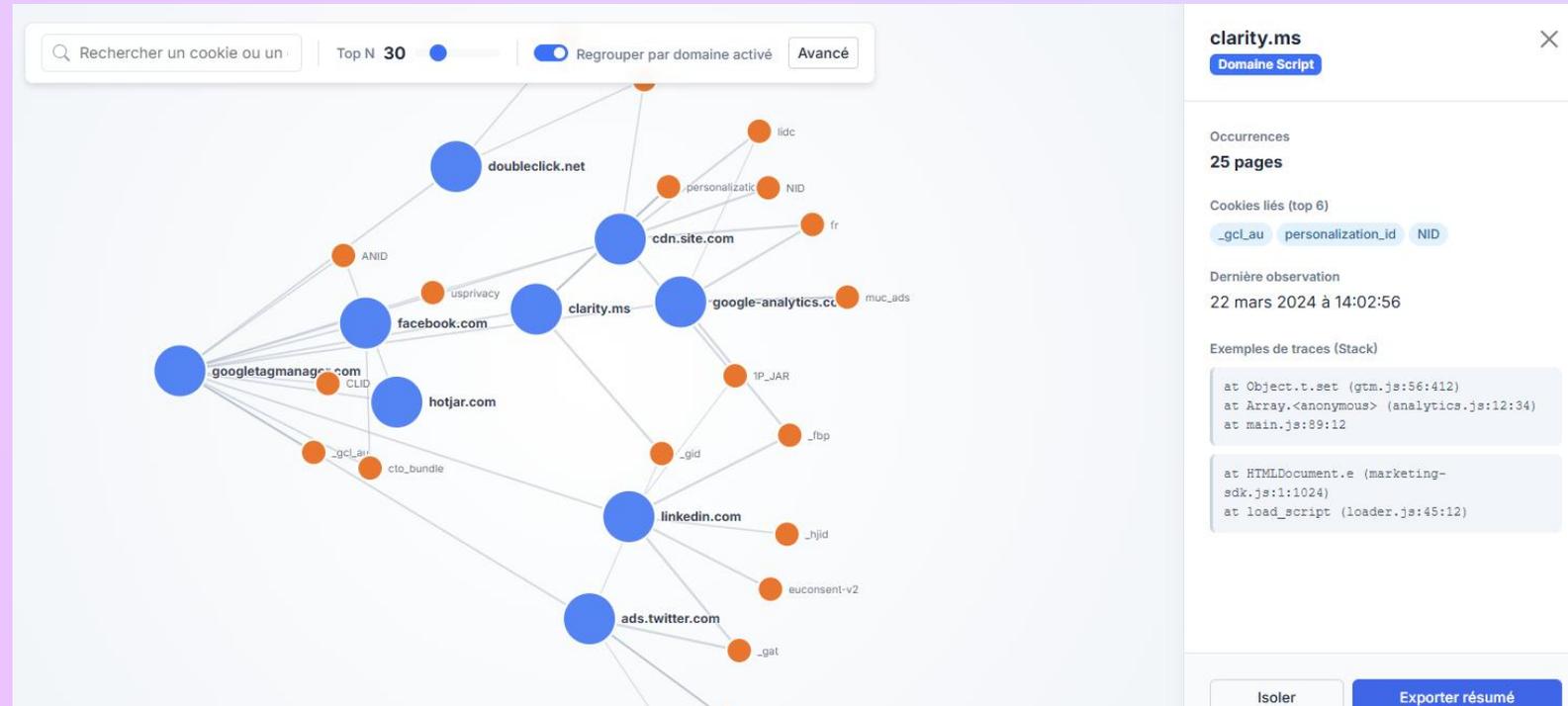
Dashboard Overview

A 360° view to monitor, prioritise and take action.

Monitor (Overview)

- **Compliance score:** A real-time health indicator (0-100).

- **Volume & Trends:** Tracking of detected cookies and at-risk pages over 7 days.

Embedded intelligence

- **Next Best Actions:** Automatic suggestions for the most impactful corrections to your score.

- **High-Priority Issues:** List of critical violations (e.g., marketing cookies before consent) ranked by severity.

Notice Manager:

- Track different versions of the Cookie Notice published to correlate changes in scripts and banners.
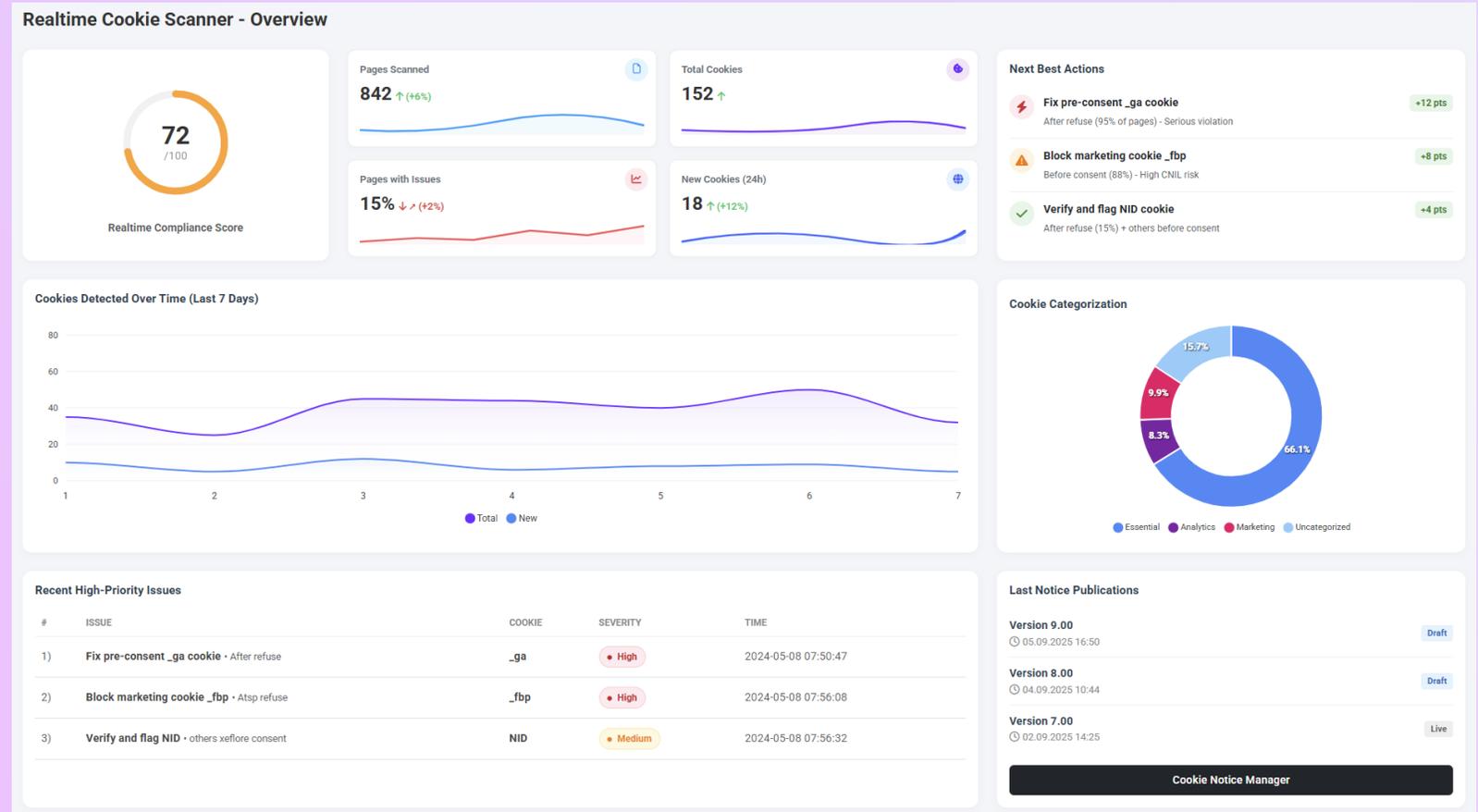
Compliance summary

Transform technical data into management indicators.

Score-based management

- **Cookie Compliance Score:** Your overall health level summarised by a score out of 100.

- **Executive Narrative:** Automated summary explaining the origin of the score and priorities.

Intelligent Prioritisation

- **Next Best Actions:** The three most impactful corrective measures with their potential point gains.

- **Top Violations:** Focus on critical cookies (e.g. deposits after refusal or before consent).

Stack Transparency

- **Key Indicators:** Overview of the number of cookies before consent, after refusal, and the total volume scanned...

- **Breakdown by Status:** Overview of the total number of cookies detected