



## PRIVACY POLICY IKAWA Ltd ("IKAWA")

### 1. IKAWA'S Privacy Promise

- Your privacy is of the highest importance, and we are committed to protecting your personal information when you interact with us. We are not interested in collecting every personal detail about you. Our interest is in providing you with a high quality service and user experience.
- We will tell you how we use your data, and make sure we collect and store it securely.
- We will give you control of your data and your preferences.
- When you provide personal information to IKAWA we are legally obliged to use your information in line with all laws concerning the protection of personal information in particular the General Data Protection Regulation (GDPR).
- We do not however accept any responsibility or liability for the privacy practices of third party websites and your use of linked or other websites is at your own risk.

### 2. Policy General

This policy relates to our use of your personal information provided to us through our website, the roaster or the App.

When you; visit our website, use our roaster, download our App, transact with us, contact us, talk with us in person or online, we may collect certain personal information from you.

This is in order to service your requests, purchases, offer you fantastic coffees to roast, or assist with other enquiries.

This Privacy policy explains the following:

- WHO is responsible for the use of my data.
- WHAT information IKAWA may collect about you.
- HOW IKAWA will use information we collect about you.
- WHEN IKAWA may use your details to contact you.
- WHETHER IKAWA will disclose your details to anyone else.
- YOUR CHOICES regarding your personal information.

### 3. WHO is responsible for how my data is used

Our privacy policy applies to the personal data that IKAWA collects and uses. "IKAWA" means IKAWA Ltd (a company registered in England and Wales) under company number 07133409, with registered office at Unit 9 Bayford Street, Bayford Street Business Centre, London E8 3SE. We control the ways your personal data are collected and the purposes it is used by us. As defined by law, we are the "data controller".

Although certain data are collected by us to enable us to perform our contract or to provide the services we offer to you, you have control over your preferences in respect of receiving marketing or other communications from us. You will have a choice to opt in to such marketing and once you have consented we will record that is your position. If you do not consent, we will not include you in our marketing communications, and we will record that we do not continue to send you marketing or other information.

You may change your mind at any time. To do this you will need to email us to at



compliance@ikawacoffee.com to ask for your details to be changed and withdraw your previous consent.

We want you to be able to review and amend your preferences at any time, by emailing us at compliance@ikawacoffee.com with the heading “unsubscribe” or by unsubscribing directly on the email. If information we hold on you is wrong, needs updating, correcting, or deleting you can also email us at compliance@ikawacoffee.com to inform us of the corrections required.

#### 4. WHAT information will IKAWA collect about me?

##### HOW will it be used?

##### WHEN will it be used?

- Information you share with us.

Personal information is data that relates to you and can be used to identify you either directly or in combination with other information we hold. Your personal data may include for example:

- Transaction data - your name, your contact details (address, telephone number)
- Financial transaction data - your bank or card details following a purchase
- Navigation behaviour - information relating to how you interact with our website, App or IKAWA roaster.
- General contact - how you interact with us and general communications between us including posts to our forum.

When you use our website, roaster or App, sign up to receive a service or participate in any service, use the website in some way, interact with us in person or at a stand or show, or purchase an item, we may collect some personal data about you.

If you share details of other people with us (for example if you buy IKAWA products on behalf of another person) please ensure they are happy for you to share their personal information with us and for us to use it in accordance with our Privacy policy.

- Information from your IKAWA roaster.

As well as the personal information you share with us about yourself and your IKAWA roaster, we will collect and handle personal information directly from your IKAWA roaster. This means that where your IKAWA roaster is operated through an App, we are able to collect information about your use of it. For example, we collect information relating to when the roaster was used and for how long, what data was sent between the roaster and App, as well as to note any error states which could indicate a technical error.

- Information from your online interactions

We collect and store some personal information from your visits to our website. Any personal information collected will be used in accordance with this Privacy policy. By continuing to use our website you will be asked to accept our Cookie Policy.

- Email communications

We may send you a variety of communications about your IKAWA products, our services or support, by email. We may send you offers, upcoming launches, new coffees we have to offer, latest announcements or technical updates, however you will have the option of choosing whether or not to receive this information or update or change the way we contact you.

- App data usage

We will collect your roaster usage behaviour and your roasters behaviour including your frequency of use, your location of usage, profiles roasted on the roaster, and errors states, potentially caused by a technical issue. If you wish to disable your data usage tracking, you are able to do this through your App in the settings.

#### Social Media

You may use social media to contact us. Online and social media sites such as Facebook have their own privacy policies explaining how they use and share your personal information. You should carefully review their privacy policies to make yourself aware of how your personal information is being collected and shared.

Categories of data we collect, why and how collected, the purpose we collect for, and the legal basis on which we collect are all set out in the table below:

Data collected	Why & how collected	Purpose of collecting	Legal reason	Retention
Transaction data – 1) Your contact details -name, surname, email address, telephone/mobile number and postal address	When you create an account on our website or App; or When you make a purchase; or When you participate in an offer or competition.	<ul style="list-style-type: none"> <li>• To provide you with the best service and support for our products</li> <li>• To allow you to make purchases and for us to be able to contact you in relation to that purchase and provide good after care service.</li> <li>• To allow us to process and mail your order to you.</li> <li>• To make sure we can contact you as required, to be able to notify you of the status of your order.</li> </ul> <p>We collect this to perform the contract. If you opt out of receiving marketing communications from us we will still use this personal data for the specific purpose set out above as this is not used for marketing purposes.</p>	Performance of our contract.	7 years
Transaction information -	When you make a payment to us.	To perform the contract. This will be shared with third	Performance of contract.	7 years

2) Financial information, bank payment/card or paypal details.		parties eg bank/paypal / credit card company, only so far as it is necessary to complete the transaction.		
General contact details	You provide this information when you contact us by any means.	If you are happy for us to do so, we may keep your contact enquiry/details for future marketing purposes. We may offer you new products we believe to be of interest to you. You may prefer that we do not keep your details on our database for marketing purposes. We will ask you to consent to this being kept by us.	Consent (if you consent to receiving marketing communications from us).	1 year
Information from your online activity	When you navigate on our website. To monitor website usage and performance and customer behaviour.	<p>We use information from your online interactions held by itself or combined with other personal information, and use data analysis software for the purpose of identifying how well our website is working.</p> <p>We use cookies and collect IP addresses to enhance your user experience and customize it.</p> <p>If you are happy for us to do so, and/or for us to contact you with more relevant and interesting future marketing material we will do so with your consent. No direct marketing will be activated unless you consent.</p>	<p>Legitimate interest for Usage Data and Monitoring. Data may be passed to data analyst third parties (We partner with 3<sup>rd</sup> parties, eg Google Analytics, Klaviyo, Agile CRM, WordPress, Optimonster. )</p> <p>Consent. We ask you to accept our cookie policy</p>	1 year
App usage data	When you download and use the App. To monitor roaster usage and performance and customer behaviour.	<p>User data are collected to analyse the app and roasters performance and user behaviour in order to provide you with product support and improvements.</p> <p>Based on the roast data we collect, we acquire insight to provide you with the most applicable communications (via App notifications or email) regarding areas such as suggested coffees</p>	<p>Legitimate Interest. We use a third party data processor, eg Google Firebase who comply with the General Data Protection Regulation in</p>	7 years

		and roast profiles, offers relating to coffee or service updates for your machine.	the same way that we do and will look after your data.	
Owner support contact	Once you become the owner of an IKAWA roaster, we may contact you regarding the product you own.	We may need to write to you to provide you with an updated version of our warranty, instruction manual or details of how you obtain support or safety recall or other announcements.	Legitimate interest.	1 year
Marketing Data - email address, location, coffee related interests relevant to sending you news and offers or communications about our latest products.	We use the details you have provided and have consented to us using to contact and advertise to you. You will be asked to opt in and give your marketing consent at any point at which you present personal data (checkout, sign up portals)	We may inform you by email or other means such as direct mail, about news, software updates, products or services of our offers. To keep you posted on news regarding IKAWA. We may also use your data to send you targeted advertising.	Consent - if you consent to us contacting you for marketing, either when you sign up for an account, via sign up portals, sharing your details at trade shows or when you make a purchase, you will be asked if you wish to receive marketing.	7 years
Other potential uses of your information	We may use your personal information already provided.	To assist in any dispute, claim or investigation relating to your IKAWA machine or product. To detect and prevent fraudulent transactions. To comply with our legal obligations.	Legitimate interest.	6 years.

### Our Marketing Promise

We want to keep you posted on our latest products, offers, opportunities, news, trade shows, launches or service or App updates, or even changes to our policies or pricing. We also want to honour your privacy.

Our promise is that we will ask your preferences to the marketing you will receive and follow these.

We will:



- only send you marketing communications and advertising when you say it is ok to do so;
- not pass your personal information to others for the purpose of marketing;
- always give you the option to stop receiving marketing communications.
- Only use the data you provide us for the purpose of improving our roasters, service and communications.

We will not collect sensitive personal data such as your race, ethnic origin, physical or mental health, religious beliefs or anything relating to criminal records.

We do not knowingly collect data on children. If we learn we have inadvertently obtained personal information from a child, we would delete this information as soon as possible.

#### Non-Personal Information, Cookies, Tracking Technologies

We may collect data in a form that does not, on its own, permit direct association with you, this is called non-personal information. We may collect, use, transfer, and disclose non-personal information for any purpose.

We use this data principally to analyse how customers are using our website and App. Tracking software may help us monitor customer traffic patterns and usage on both our App and website. Cookies enable you to navigate on our website and App and allow us to provide features, such as remembering your last search or to make subsequent searches faster.

The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as your city location, search queries & search history
- We may collect information regarding customer activities on our website. This information is used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest.
- We may collect and store details of search queries. This information may be used to improve the relevancy of results provided by our services.
- collect and analyse data about how you use your roaster and application.

If we combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

We have a cookie policy which provides you with information on how we use them and how you can remove them see [here](#).

#### 5. WILL IKAWA disclose my information to anyone else?

We will keep your information, confidential except where disclosure is required or permitted by law (such as to law enforcement or government agencies), to reasonably enforce our terms and conditions and/or protect our operations.

We are particularly careful to respect the data of our roaster users who we know take time and effort to create their own roast profiles. We therefore treat your roaster data (that you haven't shared) with extra care, and do not disclose the data to other users without permission.



In the event that you have posted or sent offensive or objectionable content to IKAWA or engaged in disruptive behavior and IKAWA believes you have breached any laws of England and Wales then we reserve the right to inform the relevant body such as police or appropriate law enforcement.

Otherwise, as stated in this policy, for the express purposes required to service and process your interaction with us, we disclose information to the following third parties:

- To receive effective payment we will have to share your information with banking/credit/debit card providers and the paypal system.
- Delivery/postal companies we use will require your personal information to process your delivery or repair correctly.
- Those providing us with IT services
- Third parties that may be helping us with audit, financial, insurance or administrative services.
- Data analyst consultants we are in contract with from time to time, to help analyse our user data and behavior and provide us with breakdowns and details of how our App is being used.
- To offer tailored marketing communications to users through the website, email and the App

We enter into Data Processor agreements with such parties to protect your data at all times.

We will collect information from you and host, store and otherwise handle that information in the UK, or in countries within the EEA, however we may allow access to your information by other third parties who act for us for the purposes described in this Privacy Policy or for other purposes approved, your personal data may be accessed by and processed outside the European Economic Area (the EEA being the European Union and Iceland, Liechtenstein and Norway). Where your personal data are transferred outside of the EEA, we will require that appropriate safeguards are in place under the specific rules on transferring personal data outside the EEA. We will include standard data protection clauses approved by the European Commission for transferring personal information outside the EEA into our contracts with those third parties.

We will require third parties to comply strictly with privacy laws and will request that such companies do not use your personal information for their own business purposes.

## 6. YOUR CHOICES regarding your personal information

### Integrity and Retention of Personal Information

We will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

### Access to Personal Information

You may request information about what personal information we hold at any time. You have the right to know what information we have, why it is being used, where it came from and who can see it (this is also known as a Subject Access Request or SAR). If you are not satisfied with the information supplied in this policy, please email us [compliance@ikawacoffee.com](mailto:compliance@ikawacoffee.com).

### Keeping Personal Information Correct

You can help ensure that your contact information and preferences are accurate, complete, and up to date by providing and updating this regularly. For other personal information we hold, we will provide you with access for any purpose, including to request that we correct the data if it is inaccurate.

Your right to object to some types of processing and request deletion of some types of the data.

In certain cases, you have the right to object to our processing of your data, in particular where we rely on our legitimate interest and if you wish to object you should contact [compliance@ikawacoffee.com](mailto:compliance@ikawacoffee.com) to request that we stop the processing, which we must consider. You may have a right to request that we delete data if we are not required to retain it by law or for legitimate business purposes.

For example for marketing purposes, you may request we delete you from our database at any time.

Right to request restriction of processing

You may request that we stop processing if you contest or disagree with how we are using your data, or if you have objected.

Right to request your data be transferred

You have a right to request, in some cases, that we transfer your data from us to you as a copy of what we hold, or transfer it to another data controller.

Access, correction, restriction or deletion requests can be made by emailing: [compliance@ikawacoffee.com](mailto:compliance@ikawacoffee.com) or by requesting to speak to our Compliance Team. For full information on all your rights we suggest you consult the webpages of the ICO. [www.ico.org.uk](http://www.ico.org.uk) and search GDPR, Individuals Rights.

Specific ways you may want to contact us through are also set out below:

Opt-in requests/ Start contacting me please

You may not have asked us to contact you, but would like to join our mailing lists and receive communications from us

- [email marketing@ikawacoffee.com](mailto:emailmarketing@ikawacoffee.com).
- Sign up to our marketing on our website [www.ikawacoffee.com](http://www.ikawacoffee.com).

Change your preferences

You may have opted-in to receive communications from us, but have changed your mind or wish to change the address or way we contact you:

- [contact marketing@ikawacoffee.com](mailto:contactmarketing@ikawacoffee.com) and state you would like to change or update the way we contact you.

Opt-Out/Please stop contacting me

If you wish us to stop contacting you for marketing or support communications then you can do so:

- [contact marketing@ikawacoffee.com](mailto:contactmarketing@ikawacoffee.com) and request that you no longer want to be contacted in this way.
- use the unsubscribe option we included in our email correspondence (in all our marketing or support type communications).
- [email compliance@ikawacoffee.com](mailto:emailcompliance@ikawacoffee.com).

Third-Party Sites and Services

If IKAWA websites, products, applications, or services contain links to third-party websites, products, and services, then any information collected by such third parties will be governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties. If we have not shared your personal information with them, we are not held liable for the actions or omissions of

these third party sites and services.

#### Security of your personal information

To ensure all your personal information is secure, we are clear with our security guidelines and rules on who has access to this information with respect to all IKAWA employees and we promise to strictly adhere to those safeguards especially in the case of any breach of our Privacy or Data Protection policy which is designed to be there to protect your information. If you suspect or know that your personal data has been breached, or if you become aware of a breach occurring in whatever form, you should immediately email [compliance@ikawacoffee.com](mailto:compliance@ikawacoffee.com) asking for contact from our Compliance Team..

#### 7. Privacy Questions

If you have any questions or concerns or requests regarding IKAWA's Privacy Policy please contact us at [compliance@ikawacoffee.com](mailto:compliance@ikawacoffee.com) by addressing your email to our Compliance Team. Alternatively, you may call us 0207 729 5664.

All such communications are examined and replies issued where appropriate as soon as possible. If you are unsatisfied with the reply received, you may refer your complaint to a local data protection authority. If you ask us, we will provide you with information about relevant complaint avenues which may be applicable to your circumstances.

#### 8. Changes to this Privacy Policy

IKAWA may update its Privacy Policy from time to time to keep in line with current legislation in particular. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy.

31st May 2018