COBRA COFFEE LIMITED RETAIL AND WEBSITE PRIVACY POLICY

1. Policy Summary

Cobra Coffee Limited (otherwise referred to in this policy as 'Cobra Coffee', 'we' and 'us') and is a member of Siena Co-operative Limited and subsidiaries (Siena Co-op). Siena Co-operative Limited and subsidiaries is a subsidiary of Co-operative Group Limited.

This is the Cobra Coffee retail privacy policy. We respect your privacy and are committed to protecting your personal data in accordance with data protection law, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018) and the Data (Use & Access) Act 2025. This privacy notice tells you how we look after and process your personal data when you attend a Cobra Coffee location.

2. Who we are

Full Name: Cobra Coffee Limited - Siena Co-operative Limited and subsidiaries

ICO registration: ZA200869

Address: 1000 Lakeside, Western Road, Portsmouth, PO6 3FE

We have appointed Bruce & Butler to act as our outsourced data protection officer ("DPO"). The DPO is responsible for overseeing data protection compliance within all of Siena Co-op's entities. If you have any questions about this privacy notice, our use of your data or anything relating to the data we hold about you, please contact the DPO using the contact details below:

Email: dataprotectionofficer@southerncoops.co.uk

3. The Personal Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified, or is identifiable. It does not include data where the identity has been removed (anonymised data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Category of personal information	Description
Identity details	First name, last name, title, date of birth, image.
Contact details	Telephone number(s), email address(es), postal address(es), work address(es).

Communication details	Feedback, questions, notes, any data that is contained within a message body or a subject from an individual.
Bank details	Sort code, card number, expiry date, account number, account name, bank branch, transaction date, details about transaction made by you relating to products or services from Cobra Coffee.
Technical Details	IP address, operating system, web browser, device ID, time zone location and setting, cookies,
Usage data	Information about how you use our website, products and services.

4. How we collect your personal data

We will collect your personal data directly from you in the following ways:

- When you visit our website;
- When you consent to cookies on our website;
- When you correspond with us via email, text, telephone, social media or post.
- When you make a card payment in one of our stores;
- When you are captured on our CCTV or image capture systems;
- When you sign up to our Guest Wi-Fi;
- When you enter any competitions or prize draws with us; and

5. How We Use Your Personal Data

We are only allowed to process your personal data if we have a lawful basis to do so and are required to inform you of what that lawful basis is. We have set out in the table below: the purposes for processing your data, the categories of personal data affected, and the lawful basis on which we rely on when we process your personal data.

In some circumstances we can use your personal data if it is in our legitimate interest to do so, provided that we have told you what that legitimate interest is. A legitimate interest is when we have a business or commercial reason to use your information which, when balanced against your rights, is justifiable. If we are relying on legitimate interests, we have set that out in the table below.

Purposes for processing	Categories of personal data	Lawful basis for processing	Legitimate Interests (if applicable)
To process card payments that you make in store or online	• Identity • Bank details	• Performance of a contract • Legal Obligation	N/A
To send you offers, vouchers and information about products and services.	• Identity • Contact	• Consent	N/A

To administer any prize draws or competitions that you have entered.	• Identity • Contact	• Consent	N/A
To communicate with your enquires, complaints and compliments.	• Identity • Contact • Communication	• Legitimate Interests	To manage your relationship with us and further improve our services.
To record health and safety incidents that in our stores	• Identity • Contact • Health	• Legal Obligation	N/A
To capture your image on our CCTV systems including body worn cameras, facial recognition and number plate registration.	• Identity	• Legitimate Interests	For your safety and for the prevention and detection of crime.
To process and deliver an order or service to us as a member or customer, including the management of payments and collect money owed to us	• Identity • Contact • Profile • Marketing and Communications	• Performance of a contract • Legal Obligation	N/A
To conduct surveys and provide you an opportunity to give us feedback.	• Identity • Contact • Free notes	• Legitimate Interests	To gather feedback from customers and support the improvement of our services.
To deploy non-essential cookies ono your device when you visit our website.	• Technical	• Consent	N/A
To use anonymous data analytics to improve our website, products, services, marketing and experiences.	• Technical	• Legitimate interests	To continue to improve our services.

Your health data will also be processed where we required by law to report health and safety incidents in our stores. Our special category condition for processing biometric data is **Substantial Public Interest Conditions:** Article 9 (2)(g) of the UK GDPR.

6. Disclosures Of Your Personal Data

We may have to share your personal data with third parties for the purposes set out in the table above. In order to administer our services and meet our legal obligations, we only share your personal data with third parties in the following circumstances:

- To administer card payments made in store or online;
- To offer services provided by third party suppliers in our stores;
- To facilitate surveys for customer feedback;
- To provide analytical services;
- For the administration of IT management and support;
- To receive IT administration services, including CCTV services;
- To receive support from our professional advisors; and
- To manage and store your personal data; and
- To meet legal obligations, for example, for the purposes of national security, auditors, taxation and criminal investigations.

If requested, we will share your personal data with authorities such as:

- The Police;
- The Health and Safety Executive;
- Local Authorities;
- Her Majesty's Revenue and Customs (HMRC);
- The Courts; and
- Central or Local Government Bodies.

Before we share your personal data with a third party, we will ensure that there is an appropriate Data Processing or Data Sharing Agreement in place to protect the sharing of data.

Our website(s) includes links to third-party websites and plug-ins. Clicking on these links or enabling these connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notices. When you leave our website, we encourage you to read the privacy notice or policy of every website you visit.

7. International Transfers

The EEA is the European Economic Area, which consists of the EU Members States, Iceland, Liechtenstein and Norway. If we transfer your personal data outside of the EEA, we must tell you and we must rely on one of the following:

- **Adequacy Decision:** The country we send your personal data to provides an adequate level of protection which has been approved by the European Commission.

- **Standard Contractual Clauses (with the IDTA Addendum):** The recipient of your personal data has provided us with signed Standard Contractual Clauses with the IDTA Addendum include. This holds the recipient accountable to safeguard the personal data.

- **International Data Transfer Agreement (IDTA):** The recipient of your personal data has provided us with a signed IDTA which has been approved by the Information Commissioners Office (ICO). This holds the recipient accountable to safeguard the personal data.

Currently there are no circumstances where your personal data may be transferred outside of the EEA.

8. How do we protect your personal data?

We take the security of your personal data seriously. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are operating under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

9. Retention of your personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes of our processing. This includes satisfying any legal, accounting, or reporting requirements.

When we assess the retention of your personal data, we will take the following into consideration:

- Nature of the information;
- Sensitivity of the information;
- Potential risks if the information was breached;
- The purpose(s) for which we initially processed the information;
- Whether we can achieve the purpose(s) through less invasive means; and
- Any applicable legal requirements.

Cobra Coffee's CCTV systems retain footage for approximately 30 days from date of recording. After this period of time has elapsed, footage is automatically overwritten. We will only retain CCTV footage for longer where there is a legitimate reason to do so.

In some circumstances you can ask us to delete your data. See request erasure below for further information.

We may also anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. Your Data Subject Rights

All individuals who engage with us have data subject rights relating to the processing of their personal data. These are the rights that apply to your personal data held within Cobra Coffee:

- **The right to be informed** – you have the right to know what information we hold and process about you which is why we have provided this Privacy Notice.

- **The right of access** – you have the right to ask for a copy of the information we hold relating to yourself.

- **The right to rectification** – you have the right to ask for us to correct any information we hold which may be inaccurate or incorrect.

- **The right of erasure** – you have the right to have your personal data 'erased' in the following situations:

    - Where the personal data is no longer required for the purpose(s) for which it was originally collected or processed;
    - Where the processing was based on consent and you have withdrawn your consent;
    - When the personal data was unlawfully processed; and
    - When the personal data has to be erased in order to comply with a legal obligation.

- **The right to object** – you have the right to object to the processing of your personal data in the following circumstances:

    - The purpose of the processing activity is direct marketing;
    - Where the processing is based on legitimate interests; and
    - Processing for the purposes of scientific/historical research and statistics.

- **The right to restriction of processing** – you have the right to ask us to restrict the processing of your personal data in certain situations such as:

    - Where you contest the accuracy of your personal data, we will restrict the processing until you have verified the accuracy of your personal data;
    - When processing is unlawful, and you oppose erasure and request restriction instead; and
    - Where we no longer need the personal data, but you require the information to establish, exercise or defend a legal claim.

- **The right to data portability** – You have the right to request that we transfer your personal data to a third-party. This right only applies to automated personal data which you have either provided your consent for us to use or where we have used your personal data to perform a contract with you.

- **Rights in relation to automated decision-making including profiling** – you have the right to question decisions being made about you without any human involvement.

Should you wish to action one of your Data Subject Rights, please contact our DPO at dataprotectionofficer@southerncoops.co.uk

11. Changes to this Privacy Notice

We may update this Privacy Notice at any time, and we will provide you a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions in relation to this notice, please contact our DPO at dataprotectionofficer@southerncoops.co.uk

12. Not happy?

Please let us know if you are unhappy with how we have used your personal data by contacting our DPO.

As stated in The Data (Use & Access) Act 2025, you have the right to lodge a data protection complaint with us, should you be unhappy with the way we have processed your personal data.

Your complaint will be managed and responded to by our Data Protection Officer (DPO). Their role will be a conduct an independent investigation into the grounds for your complaint and provide an outcome to you. Your complaint will be responded to with a final written response within 30 days of receipt.

Should you wish to make a data protection complaint, this can be done by contacting the DPO in the following ways:

Email: dataprotectionofficer@southerncoops.co.uk

If we receive a data protection complaint, we will respond to you within 30 days.

If you are not satisfied with our response, you also have a right to complain to the Information Commissioner's Office (ICO). You can find their contact details below. We would be grateful for the chance to deal with your concernsbefore you approach the ICO so please contact us in the first instance.

Address: Information Commissioner's Office,
Wycliffe House
Water Lane,
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113