

# Costa Club Privacy notice

**May 2022**

Costa Limited ("Costa", "We", "Us") may collect your personal data. We respect your data, and your privacy is important to us. This Privacy Notice explains what personal data we collect and how it is used. This notice also explains what rights you have over your personal data and how you can use those rights.

You have the right to object to some of the processing which Costa carries out. More information about your rights and how to exercise these is set out in the "[Your rights](#)" section of this notice.

Costa Limited's registered office is Costa House, 6 Porz Avenue, Houghton Hall Business Park, Houghton Regis, Dunstable, Beds, LU5 5YG, United Kingdom

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# 1. Summary of how we use your data and your rights

We use your data to manage our Costa Club loyalty scheme, provide and improve our products and services, including for marketing, research, feedback and enquiries, and for safety and security purposes.

We will use your data to comply with laws and regulations. We use your data to prevent and detect crime, such as fraud.

You have the right to object to some of the processing Costa carries out. More information about your rights and how to exercise these is set out in the "[Your rights](#)" section of this notice.

When you give consent, you are able to withdraw that consent at any time via the app or by emailing us, details in the contacts section at the end. You can also exercise any other data rights, such as obtaining a copy of your data, correcting, deleting or restricting how we use your data. Please see "[Your rights](#)" for more information.

You can unsubscribe from marketing communications at any time. To opt out of direct marketing, you can either adjust the preference settings in your Costa Club account on the app, select "unsubscribe" in emails, or email us, details in contacts at the end of this notice. For opting out of profiling for direct marketing purposes, you will need to email us at the same address. By choosing not to receive marketing emails, you will miss out on our great offers, but will still be able to collect beans.

Our website and app use cookies and similar technologies to improve functionality, recognise you and to customise your experience. You can

reject and block cookies in your browser settings. Please see our [Cookie Notice](#) for more information.

Where available, if you enable location services on the app, or you access the location finder on our sites and your browser settings allow this, your device will identify and alert you to the nearest Costa Store to your location.

## **2. Information we collect from you**

We collect information when you join our Costa Club and purchase something or use our services. This includes store visits, using our websites or app and corresponding with us. In particular:

- We keep information you give us directly such as contact details (including name, email, address and telephone number), comments, region, frequency of visits, feedback and marketing opinions.
- Where applicable, we record and analyse store, web and app visits, details of your purchases, including where you take advantage of our promotions.
- If you engage with us online via our website or app, our cookies and similar technologies will capture your IP address, your location, and record how you use the site or app to help improve it and improve your user experience, where your browser settings or permission allows for this.
- If you post information online about us or provide feedback, we keep a record.
- If you contact us directly and complain or give feedback, receive compensation, we will record details and all related information (including that you provide to us) such as emails, letters, phone calls, date of birth to our product customer information helplines, including those operated by third parties as detailed in Section 5 below.

### 3. Information we receive from third parties

We receive your information from other people in certain circumstances. This can happen when:

- We obtain your in-store transaction details from your local store operator Devyani International Ltd so you can get your Costa Club rewards. For information as to how they handle your in-store data please refer to their privacy notice <https://dil-rjcorp.com/privacy-policy/>.
- You participate in market research, such as focus groups or surveys.
- We may also indirectly collect from our social media partners the fact that you are using their social networks and your associated advertising identifiers

### 4. How we use information and the legal basis

We are allowed to use your data only if we have a proper reason to do so such as:

- When you consent to it; or
- To comply with the law.

We have set out below how and why we use your personal information.

- When you join our Costa Club to fulfil our contract with you.
- To communicate with you, check your identity and provide products and services including awarding loyalty points if you are a Costa Club member.

***We use your information to run our loyalty scheme.*** This includes:

- Keeping our records up to date,
- Fulfilling our legal, compliance and contractual duties,

- Working out which of our products and services may interest you, improving our site and apps, and services, developing new products and services, and telling you about them and conducting market research.
- To provide and improve our products and services in relation to Costa Club and to respond to you if you contact us.
- To record communications, including incoming and outgoing calls and emails, for staff training, quality improvement purposes and establishing facts and to deal with concerns or complaints that you may raise.
- When we monitor Costa websites, social media platforms such as Facebook and Twitter and online services including our mobile app and responses to email marketing. If you post comments online or in other media, we capture this information, use it to contact you, and use it to improve our products and services.
- Show targeted advertisements within your social networks and to other people like you
- To run competitions and promotions and track which offers seem of interest to you
- To understand you better as a customer by analysing your transactions and other information you provide to us or which we learn through your interactions with us.
- To send you emails and SMS messages including offers tailored to your perceived preferences where you are a Costa Club member and your preference settings permit this. We record which emails seem to be of interest to you. Based on your purchase history and membership card usage, some Costa Club members may be offered additional beans.
- To contact you where you provide us with market research feedback or pass this data to a third-party business partner of ours for panel market research analysis.

We also process the insight data for our legitimate interests to understand how you interact with our Facebook page and its contents and to help us improve our services and contents

To prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, including where we are required to do so by law, we:

- Monitor Costa Club accounts and record communications and emails.

To comply with law, assess and uphold legal or contractual rights and claims, and for monitoring, auditing and training on compliance matters:

- We monitor and record communications, including incoming and outgoing calls and emails.
- We verify your identity in certain circumstances.
- We will process information in connection with any complaint that you make in relation to the service which you receive.

***If you give us consent, we:***

- Send you electronic marketing, including promotions and offers, in relation to our products and services. *Costa Club members can subscribe or unsubscribe from our marketing communications at any time through the app.*
- Use cookies or similar technologies on the website, app and in marketing emails, including analytic cookies. For more details on our use of such technologies, [click here](#) to see our Cookie Notice.
- Through the settings on your device, send you push notifications through the app.
- If you use the store locator in the app or site and enable location services, it will notify you of the nearest Costa.
- Use data for other purposes where we explain that purpose when we ask for your consent.

When you give consent, you are able to withdraw that consent at any time by contacting us at the email address at the end of this notice. If you do so

we can only continue to use your data if another legal basis applies, such as when we're required to do something by law.

**When the law requires us to process your data we will do so. This can include:**

- Legal, compliance, regulatory and investigative purposes, including for government agencies and law enforcement.
- When you exercise your rights under data protection legislation.

## **5. Data Sharing**

We will share your data with Devyani who operate Costa stores in India for any queries or complaints relating to in store experiences and administering the loyalty scheme. Where applicable, we also use third party providers for the following services:

- Providing consumer service support for our loyalty scheme
- Sending promotional offers
- Customer feedback surveys
- Data analysis to enable us to optimise our services (including locations and products)
- IT development, support, maintenance and hosting, including the provision of applications and website hosting

We may also share data with Social Networks (e.g. Facebook).

If our business is to be integrated with another business or sold, your details would be shared with our advisers and any prospective purchaser's advisers. Your information could be passed to the new owners. (You will be notified if this happens).

Personal data may be shared with government authorities and/or law enforcement officials for the prevention or detection of crime, if required by law or if required for a legal or contractual claim.

## **6. International transfers**

Sometimes we send or store your data outside of India. For example, to follow your instructions, comply with a legal duty or to work with or receive services from our service providers who we use to help run your accounts and our services.

If we do transfer information outside India, we will make sure that it is protected by transferring it only to such a non-Indian entity that ensures the same level of data protection that is adhered to by us under Indian law. The transfer will be done only if is necessary for the performance of our lawful contract with you, or where you have consented to the transfer.

## **7. Cookies and similar technologies**

Our website, apps and marketing emails use cookies and similar technology. Full information is in our [Cookie Notice](#). This includes information on how to adjust your browser settings to accept or reject cookies.

## **8. Data retention**

We keep your data to enable us to fulfil our contract with you or to provide services, whilst you are an active user of our site or app or where required by law or to protect legal rights. We do not retain your personal data for longer than is required for the purposes stated in this Privacy notice as detailed in Section 4 above.



We always look to keep your data for the minimum time in line with data protection principles and our processes. For example, we keep information on Costa Club members as follows.

- If you register but do not collect and/or use any beans using your card or app within 12 months, your registration beans will expire, and we will delete your Costa Club account information at that point.
- If you do not collect and/or use your beans for 2 years, we will delete your Costa Club account information.
- Customer feedback and correspondence with our customer services teams depending on the nature of the interaction and any applicable law. This enables us to respond to any questions or complaints.
- We may show advertisements on your social network newsfeed and to other people like you for 2 years after our last contact from you.
- Information to maintain records according to rules that apply to us.

If you unsubscribe from marketing communications, we keep a record of this request indefinitely to ensure we do not send you direct marketing again

We may keep your data for longer if we cannot delete it for legal or regulatory reasons.

## **9. Your rights**

You have rights over your personal data. You can:

- ask for a copy of your information;
- ask for information to be corrected;
- ask for information to be erased or deleted;
- ask for us to limit or restrict processing;
- object to us processing your data, in particular, where we do not have to process the data to meet a contractual or other legal requirement and in

relation to processing for direct marketing purposes, including profiling for direct marketing purposes;

- ask us to send you a copy in a structured digital format or ask for us to send it to another party.

Some rights, however, may be limited. We may be obliged by law or regulation to keep information. We must respect other people's privacy as well, which means we may need to redact or remove information where it includes personal data about someone else, even if it is connected to your data.

If you want a copy of your data, to object to how we use your data, or ask us to delete it or restrict how we use it or, please see '[Contact details](#)' below. To process a request from you, we may need to confirm your identity to ensure we're accessing the right data.

## 10. Contact details

To discuss or change your Costa Club account details, including preference settings, you can log into 'My Account' on the app and go to (account details) and Contact Preferences or contact consumer general enquiries at [customercare@costaconnect.in](mailto:customercare@costaconnect.in)

For consumer general enquiries relating to your loyalty account please contact: [customercare@costaconnect.in](mailto:customercare@costaconnect.in) or Tel No 9029002363

To exercise any of your rights or to withdraw consent (where you provided it) please use the app or contact: [customercare@costaconnect.in](mailto:customercare@costaconnect.in) or Tel No 9029002363

For complaints relating to your loyalty account, please email the Grievance Officer: [IndiaGrievanceOfficer@costacoffee.com](mailto:IndiaGrievanceOfficer@costacoffee.com).

For any queries relating to data protection, please contact Costa's Data Protection Officer by email at [costadpo@costacoffee.com](mailto:costadpo@costacoffee.com) or write to them at Data Privacy Team, Costa Limited, Costa House, 6 Porz Avenue, Houghton Hall Business Park, Houghton Regis, Dunstable, Beds, LU5 5YG, United Kingdom

We may change or update this notice from time to time. We will communicate these as appropriate – for example, by updating our website or, where legally required, by actively telling you about the changes.

## **11. Which Costa entity is the collecting your data?**

We are Costa Limited, Costa House, 6 Porz Avenue, Houghton Hall Business Park, Houghton Regis, Dunstable, Beds, LU5 5YG, United Kingdom. Costa Limited runs the Costa Coffee Club within India.

When you visit our **Facebook** page, Facebook Ireland will collect certain personal data from you, and they will give us anonymous analytics data about you. This is called insight data and you can find more information about how Facebook processes it [here](#). Facebook and Costa are joint controllers over the insight data. For any other processing we are separate controllers, please refer to Facebook's **Data Policy** to understand how they process your personal data.

If you would like to exercise your data subject rights over this insight data please contact us or **Facebook**.

Please remember that when you click a link to go from our website to another website, our Privacy Policy no longer applies. Any browsing and interaction on another website, is subject to that website's or third-party notices and

policies which we recommend you read. This policy applies solely to data collected and processed by Costa Coffee.

Some stores using the Costa brand are franchisees. Franchisees are all committed to protecting your privacy but, just to be clear, each Costa franchisee is an independent business and is responsible for the operation of its own stores and compliance with data protection law.

## **12. Security Practices**

Costa implements data security practices and standards that are commensurate with the nature of our business. Our information security policy is available on request, please email: [costaclubenquiries@costacoffee.in](mailto:costaclubenquiries@costacoffee.in)