

COMO

# Privacy Notice

## Privacy Notice

We take your privacy very seriously and are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website [www.como.london](http://www.como.london) ("our Website") (regardless of where you visit from), when you download and use any applications or application software ("apps") (for example apps on a mobile device) hosted or made available by us, when you purchase a product or service and when you correspond with us by telephone, email or otherwise. It tells you about your privacy rights and how the law protects you.

## IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this privacy notice

This privacy notice aims to give you information on how Como London Limited (Company Number: 12417226) collects and processes your personal data including any data you may provide when you:

- visit our Website as a customer;
- use apps hosted by us before and once you have streamed or downloaded a copy onto your device;
- purchase a product or service; and
- you correspond with us by telephone, email or otherwise.

Our Website and apps are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### Who we are

Como London Limited (Company Number: 12417226) ("we", "us", "our") is a 'data controller' for the purposes of your personal data. This means that we determine the purpose and means of the processing of your personal data and are responsible for it. You will find our contact details at the end of this privacy notice (see below: "How to contact us").

## PERSONAL DATA WE COLLECT ABOUT YOU

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

We may collect, use, store and transfer different kinds of personal data about you. This may include:

- Identity Data: Full name; maiden name, username or similar identifier, marital status, title, date of birth and gender;
- Contact Data: Job title, details of your employer or the organisation you represent, address (including billing and delivery addresses), e-mail address, telephone numbers (mobile and landline);

- **Financial Data:** includes bank account and payment card details, information required for us to undertake credit or other financial checks;
- **Transaction Data:** details about payments to and from you and other details of products and services you have purchased from us;
- **Device Data:** includes the type of mobile device you use, and unique device identifiers, mobile phone number, mobile network information, mobile operating system, times zone settings;
- **Location Data:** technology to determine your current location. Some of our location enabled services require your personal data for some features in our apps to work. If you wish to use the particular features, you will be asked to consent to your data being used for this purpose and you can withdraw your consent at any time disabling location data in you settings for our apps;
- **Voice, Image and Photographic Data:** digital photographs and images both static and moving (including photographs, recorded and live video) and voice data;
- **Technical Data:** internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website and any apps we host;
- **Profile Data:** username and passwords, purchases or orders made, interests, preferences, feedback and survey responses;
- **Usage Data:** information about how you use our Website, apps, products and services;
- **Marketing and Communications Data:** your preferences in receiving marketing from us and our third parties (if any) and your communication preferences; and
- Information that you volunteer to us when you correspond with us by telephone, email or otherwise.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We may also collect, use and share “Aggregated Data” such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or parts of our apps. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

#### **If you do not provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to enter into or perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this situation, we may need to cancel a product or service you have with us but we

will notify you if this is the case at the time.

## HOW YOUR PERSONAL DATA IS COLLECTED

Depending on the circumstances, we use different methods to collect personal data from and about you including:

- **Directly from you.** You may give us your personal data by logging on to our Website, into any apps and corresponding with us by social media, post, email, telephone or otherwise. This includes personal data you provide when you:
  - Apply for our products or services;
  - Register for or create an account on our website or app;
  - Download our apps, subscribe to any services provided on the app;
  - Subscribe to our service or publications;
  - Request marketing to be sent to you;
  - Use your camera, video or microphone functions when utilising our app;
  - Enter a competition, promotion or survey; or
  - Report any problems, give us feedback or contact us.
- **Other sources.** We may receive personal data about you from various third parties or other sources as set out below:
  - Credit reference agencies;
  - From an employee or representative of the organisation for whom you work;
  - Our app providers and developers;
  - Publicly available sources such as the register at Companies House, search information providers, the electoral register which may be based in or outside the UK.

• **Automated technologies or interactions.** As you interact with our Website or apps, we may automatically collect technical, device, content and usage data (as outlined in “**Personal Data We Collect About You**”) about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may use cookies to distinguish you from other users of our Website and apps, the distribution platform (Appstore) or other app services and to remember your preferences. This helps us to provide you with a good experience and allows us to improve the Website and our apps. Please see our cookie policy [LINK] for further details.

• **Location Data.** We also use GPS technology to determine your current location whilst you are using apps. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling Location Data in your app settings.

## HOW AND WHY DO WE USE YOUR PERSONAL DATA?

Under data protection law, we can only use your personal data if we have a proper reason for doing so, for example:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps before entering into a contract;
- where it is necessary for our legitimate interests or those of a third party and your fundamental rights and interests do not override those interests; or
- where you have given consent.

**In this privacy notice the follow definitions apply:**

**“Legitimate Interest”** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**“Performance of Contract”** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**“Comply with a legal obligation”** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

**“Consent”** means processing your personal data where you have signified your agreement by a statement or clear opt-in to processing for a specific purpose. Consent will only be valid if it is a freely given, specific, informed and unambiguous indication of what you want. You can withdraw your consent at any time by contacting us.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us. We may also rely on consent for downloading and installing the app and other processes set out in the table below.

The below explains what we use your personal data for and our lawful basis for doing so.

### **What we use your personal data for? Our lawful basis for processing data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below. (Page 6)

Activity	Type of data (as set out in "Personal Data We Collect About	Lawful basis for processing including basis of legitimate interest
To quote and register you or the entity you work for as a new customer/supplier	(a) Identity (b) Contact (c) Profile Data	Performance of a contract with you
To install an app and register you as a new app user	a.Identity b.Contact c.Financial d.Device	Consent
To process and deliver your order/services including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction Data (e) Marketing and Communications (f) Location Data (g) Voice, Image and Photographic Data (h) Profile Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To provide you a service and any products	a.Identity b.Contact c.Profile Data d.Location Data e.Voice, Image and Photographic f.Technical g.Profile	a.Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy, our Website, our apps or any services;	(a) Identity (b) Contact (c) Profile Data (d) Marketing and Communications (e) Financial	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Location Data (g) Technical Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business, our Website and apps (including reviewing financial performance, customer base, efficiency measures, product range and customer bases, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical Data (d) Profile Data (e) Voice, Image and Photographic Data (f) Usage Data (g) Marketing and Communications	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content, app content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical Data (g) Location Data	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website, apps, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our Website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
Other processing necessary to comply with legal and regulatory obligations that apply to our business or as otherwise permitted or required by law.	a.Identity b.Transaction c.Technical d.Usage e.Contact f.Usage g.Marketing and Communications h.Profile	Necessary to comply with a legal obligation Necessary for our legitimate interests (for running of our business and administration)
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies.	a.Identity b.Transaction c.Technical d.Usage e.Contact	Necessary for our legitimate interests (for running our business, provision of administration and in the context of a business reorganisation or group restructuring exercise) Necessary to comply with a legal obligation

We do not use personal data for automated decision making.

## Marketing communications

We may use your personal data (including identity, contact, technical, usage and profile data (as set out in “**Personal Data We Collect About You**”) to form a view on what we think you may want or need, or what may be of interest to you. We may send you periodic communications by email and post about our services or news about our business if you have requested information from us or purchased goods or services from us and have not opted out of receive that marketing.

We have a legitimate interest in processing your personal data for marketing purposes. This means we do not usually need your consent to send you information about our services or news about our business unless you have expressly opted out of receiving marketing. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never sell or share it with other third-party organisations for marketing purposes without you express opt-in consent.

You have the right to opt out of receiving marketing communications from us at any time by:

- emailing [coffee@como.london](mailto:coffee@como.london) FAO Peter Rogers
- writing to us Como, 3 Coldbath Square, London, UK, EC1R 5HL (for the attention of Peter Rogers
- using the ‘unsubscribe’ link in our email marketing
- Deleting any apps (for marketing communications sent via the app).

We may ask you to confirm or update your marketing preferences, or if there are changes in the law, regulation, or the structure of our business.

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## WHO DO WE SHARE YOUR PERSONAL DATA WITH

Depending on the circumstances, we may share your personal data with:

- External services providers eg. Website hosting provider, AppStore provider, data analytic providers, email service provider, IT provider, and postal / courier services.
- Professional advisers including lawyers, insurers, bankers and accountants who provide legal, insurance, banking and accounting services.
- HM Revenue & Customs, regulators and other authorities as required.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We do not allow service providers to use your personal data for their own purposes and only permit them to use your personal data to provide services to us for specific purposes and in accordance with our instructions.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal obligations.

We may also need to share some personal data with other parties, such as potential buyers of some or all of our business/assets or during a re-structuring. Alternatively, we may seek to acquire other businesses or merge with them. Usually, information will be anonymised but this may not always be possible. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

## **TRANSFERRING YOUR PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA**

We do not transfer your personal data outside of the United Kingdom.

## **YOUR RIGHTS IN RESPECT OF YOUR PERSONAL DATA**

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

### **Access**

The right to request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the person data we hold about you and to check that we are lawfully processing it.

### **Rectification**

The right to require us to correct any mistakes in your personal data. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

### **Erasure**

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

### **Restriction of processing**

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.



## Data portability/transfer

In certain situations, the right to ask us to transfer any personal data you provided to us to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

## To object

The right to object to **processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

## Withdraw Consent

Where we rely on consent as a lawful basis to process your personal data, you have the right to withdraw your consent at any time. To do this, please telephone, email or write to us (see below: "**How to contact us**"). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is not the case at the time you withdraw your consent.

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/). <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you would like to exercise any of those rights, please email or write to us (see below: "**How to contact us**") and let us have enough information to identify you e.g. your full name and address as well as what right you want to exercise and the personal data to which your request relates.

## Information we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Fees

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

## HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for (e.g. whilst we are providing a product or service to you), including;

- to show that we treated you fairly;
- to keep records required by law to comply with our legal obligations.

Different retention periods apply for different types of personal data and to determine the appropriate retention period we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data (as set out in (“**Personal Data We Collect About You**”))) for six years after you cease to be customers for tax and litigation purposes.

In some circumstances we will 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.

## KEEPING YOUR PERSONAL DATA SECURE

We have put in place reasonable and appropriate security measures to endeavour to prevent personal data from being accidentally lost, altered, disclosed, used or accessed unlawfully or in an unauthorised way. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only on our instructions and are subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website or app; any transmission is at your own risk.

Our Website and apps may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites or apps and are not responsible for their privacy statements. When you leave our Website or apps, we encourage you to read the privacy policy of every website and app you visit. We do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites, apps or services.

Where we have given you (or where you have chosen) a password that enables you to access our apps (or parts of them), you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

We have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## HOW TO COMPLAIN

We hope that we can resolve any query or concern you may raise about our use of your personal data. If you want to complain about how we have used your personal data, please email or write to us (see below: “**How to contact us**”). However, if we are not able to resolve your complaint to your satisfaction, you can complain to the UK regulator for data protection issues, the Information Commissioner’s Office (“**ICO**”). Further information about how to make a complaint to the ICO can be found on the ICO website [www.ico.org.uk](http://www.ico.org.uk). We would however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.



## CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated in March 2021 and we keep our privacy notice and policies under regular review.

We may change this privacy notice from time to time and when we do so, we will update the version available to you on our Website. If any changes are likely to have an adverse impact on your rights under data protection law, we will use reasonable endeavours to notify you of the changes in advance by email or by alternative means.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## HOW TO CONTACT US

If you have any queries about this privacy notice or how we use your personal data, you can contact us by email [coffee@como.london](mailto:coffee@como.london) or post as follows:

Como London Limited,  
3 Coldbath Square,  
London,  
UK,  
EC1R 5HL

### Do you need extra help?

If you would like this notice in another format (for example large print) please contact us (see above: "**How to contact us**").