

PRIVACY POLICY

Roast & Ground Privacy Policy, Revised June 2025. E&OE

BACKGROUND:

Roast & Ground Limited understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone we interact with or who visits our websites <https://roastandground.co.uk>, <https://shop.roastandground.co.uk> and <https://roastandgrounddirect.co.uk> ("Our Sites") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur by your continued interaction with us or upon your first use of Our Sites. You will also be required to read and accept this Privacy Policy when signing up for an Account. If you do not accept and agree with this Privacy Policy, you should stop interacting with us and you must stop using Our Sites immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"Account"	means an account required to access and/or use certain areas and features of Our Sites and notably https://shop.roastandground.co.uk ;
"Cookie"	means a small text file placed on your computer or device by Our Sites when you visit certain parts of Our Sites and/or when you use certain features of Our Sites. Details of the Cookies used by Our Sites are set out in section 12, below;
"Personal Data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Sites. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and
"We/Us/Our/Roast & Ground/Roast & Ground Direct"	means Roast & Ground Limited, and any trading names thereof, a limited company registered in England under company number 04523314 whose registered address and main trading address is Unit 6, Kingston Business Centre, Fullers Way South, Chessington KT9 1DQ

2. Information About Us

2.1 Our Sites are operated by Roast & Ground Limited a limited company registered in England under company number 04523314 whose registered address and main trading address is Unit 6, Kingston Business Centre, Fullers Way South, Chessington KT9 1DQ.

2.2 Our VAT number is 795384181.

Our Data Protection Officer is Catherine Gray and can be contacted by email at catherine.gray@roastandground.co.uk by telephone on, 020 8397 8676 or by post at the registered address.

3. What Does This Policy Cover?

This Privacy Policy applies to all interactions with us including the use of Our Sites. Our Sites may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. What Data Do We Collect?

Depending upon your use of Our Sites or other interactions with us, We may collect some or all of the following personal and non-personal data (please also see section 12 on Our use of Cookies and similar technologies and Our Cookie Policy) including but not limited to;

- 4.1 name;
- 4.2 business/company name;
- 4.3 job title;
- 4.4 profession;
- 4.5 contact information such as address, email addresses and telephone numbers;
- 4.6 IP address;
- 4.7 web browser type and version;
- 4.8 operating system;
- 4.9 a list of URLs starting with a referring site, your activity on Our Sites, and the site you exit to.

5. How Do We Use Your Data?

5.1 We use data to support Our business' functions. The extent of Our data collection, usage and storage differs depending on whether or not You/the company you represent is a customer.

- a) If you/the company you represent is a Roast & Ground customer the data We collect and store is in relation to the provision and payment of goods and services, and from time to time informing you/the company about additional goods and services that We offer. Occasionally We may pass limited customer data to our approved third-party delivery companies or our approved service providers for machine repair. We never sell your data. Our legal basis for capturing, processing and storing your/the company's data is to deliver our obligations as a business. Marketing communications are provided on the basis of Legitimate Interest.
 - b) If you are a prospect We hold limited data on Our prospect and website databases. These databases are made up of information gathered from Our websites, from previous engagement such as meetings, networking events, from previous telemarketing activity etc. We only capture and hold data on individuals We believe are genuinely interested in Our goods and services. We use identifiers such as job function, business location and size to establish this. Our lawful basis for capturing, processing, using and storing data on prospective customers is Legitimate Interest.
- 5.2 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 5.3 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to our blog), or because it is in Our legitimate interests. Specifically, Examples of how we may use your personal data are:
- 5.3.1 Providing and managing your Account;
 - 5.3.2 Providing and managing your access to Our Site;
 - 5.3.3 Personalising and tailoring your experience on Our Site;
 - 5.3.4 Supplying Our products and services to you (please note that We require your personal data in order to enter into a contract with you);
 - 5.3.5 Personalising and tailoring Our products and services for you;
 - 5.3.6 Replying to emails from you;
 - 5.3.7 When you provide your contact details via a website form, where they are not required for the fulfilment of Our contract with you/your company, you will be given the opportunity to indicate your preferences in terms of whether and how we contact you.
 - 5.3.8 Supplying you with Our blog(s) and/or Newsletter or other updates which are the primary ways by which we provide business updates. You may opt out of our blog emails at any time by clicking on the link provided on the blog email.
 - 5.3.9 Market research;

5.3.10 Analysing your use of Our Site and gathering feedback to enable Us to continually improve Our Site and your user experience.

- 5.4 In line with the above with your permission and/or where permitted by law (on the basis of Legitimate Interest or otherwise), We may also use your data for marketing purposes which may include contacting you by email, telephone, text message and/or post with information, news and offers on Our products and/or services. We will not, however, send you any spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 5.5 Third parties whose content appears on Our Site may use third party Cookies, as detailed below in section 12. Please refer to section 13 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 5.6 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it. We are required to keep certain types of data for the on-going fulfilment and record of goods and service provision to Our customers.
- 5.7 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):
- 5.7.1 customer data will be retained for as long as We continue to provide goods and services and for a minimum six years after provision in order to maintain accurate and detailed company accounts
 - 5.7.2 marketing data is limited to those that We legitimately believe will be interested in our offer. This data is kept up to date and if we learn that it is no longer of relevance to the associated individual for the purpose of selling our goods and services we remove the individual data from our databases. It is unlikely that We would have cause to remove a business from our database if it is within our target sector and location.

6. **How and Where Do We Store Your Data?**

- 6.1 We only keep your personal data for as long as We need to in order to use it as described above in section 5, and/or for as long as We have your permission to keep it.
- 6.2 Some or all of your data may be stored outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. When We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under GDPR.

- 6.3 Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Sites.
- 6.4 Steps We take to secure and protect your data include:
 - 6.4.1 The transactional element of our site(s) is SSL certificated which will encrypt all information entered within the website(s). The server this information is stored on is located in a data centre in London. As well as your SSL, the server sits behind an industry standard firewall and is backed up daily.
 - 6.4.2 Data sourced from the non-transactional www.roastandground.co.uk website is stored securely in line with GDPR requirements. Currently, the primary HubSpot infrastructure is hosted with Amazon Web Services in the US-East-1 region. Amazon Web Services maintains ISO 27001, SOC 2 Type II, and several other certifications.

Sessions between the portal are always protected with top end in-transit encryption, advanced TLS (1.0, 1.1, and 1.2) protocols, and 2,048-bit keys.
 - 6.4.3 Office data is stored in the cloud and are sent offsite every 4 hours to Amazons. AWS servers, data is encrypted prior to transit using AWS-256 bit encryption.

7. Do We Share Your Data?

- 7.1 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.
- 7.2 We may sometimes contract with third parties to supply products and services to you on Our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 7.3 We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include: (i) Prospect Global Ltd (trading as Sopro) Reg. UK Co. 09648733. You can contact Sopro and view their privacy policy here: <http://sopro.io>. Sopro are registered with the ICO Reg: ZA346877 their Data Protection Officer can be emailed at: dpo@sopro.io.
- 7.4 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from

time to time share such anonymised data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

7.5 Where We transfer any personal data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR including:

7.5.1 Data sourced from www.roastandground.co.uk is stored on our behalf by HubSpot. HubSpot's service is Privacy Shield certified and HubSpot offers a Data Processing Agreement for EU-based customers. More information about HubSpot's privacy program is included in their Privacy Policy <https://legal.hubspot.com/privacy-policy>

8. What Happens If Our Business Changes Hands?

8.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

8.2 In the event that any of your data is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will not, however, be given the choice to have your data deleted or withheld from the new owner or controller.

9. How Can You Control Your Data?

9.1 When you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

9.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

10. Your Right to Withhold Information

10.1 You may access certain areas of Our Site(s) without providing any data at all. However, to use all features and functions available on Our Site(s) you may be

required to submit or allow for the collection of certain data.

- 10.2 You may restrict Our use of Cookies. For more information, see section 15 and Our Cookie Policy.

11. **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us for more details at catherine.gray@roastandground.co.uk, or using the contact details below in section 14.

12. **Our Use of Cookies**

- 12.1 Our Sites may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Sites and to provide and improve Our products and services. By using Our Sites you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us.
- 12.2 Cookies are used on our shopping site(s) where they are strictly necessary for the site functionality. They are used to aid navigation, and to keep track of the contents of your shopping cart. If you log in to an account, your logged-in status is recorded in a temporary cookie. If you select the 'Remember Me' Option in the checkout, a cookie will be used to remember your details. You can turn off cookies by blocking them in your browser Privacy settings. However you may be unable to place orders or benefit from the other features or your user experience may be negatively impacted.
- Data collected by the sites is used to:
- Take and fulfil customer orders.
 - Administer and enhance the site and service.
 - Only disclose information to third-parties for goods delivery purposes.
- 12.3 Our Site www.roastandground.co.uk uses analytics services provided by HubSpot Inc, which also use Cookies. Website analytics refers to a set of tools used to collect and analyse usage statistics, enabling Us to better understand how people use Our Site.
- 12.4 For more details, please refer to Our Cookie Policy.

13. **Personal Data Breach**

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data. In the event of a Personal Data Breach arising during the performance of our services, we will ensure that the following steps are taken:

- 13.1 Notify all affected individuals in writing about the Personal Data Breach without undue delay, and at the maximum within 72 hours of becoming aware of it, and provide information, where possible, about the nature of the Breach including where possible;
 - 13.1.1 the name and contact details of the data protection officer where more information can be obtained;
 - 13.1.2 the likely consequences of the Personal Data Breach; and
 - 13.1.3 the measures taken or proposed to be taken to address the Personal Data Breach including, where appropriate, measures to mitigate its possible adverse effects.
- 13.2 Where, and insofar as, it is not possible to provide all this information at the same time, the initial notification shall contain the information then available and further information shall, as it becomes available, subsequently be provided without undue delay.
- 13.3 After investigating the causes of such a Personal Data Breach, we will take such actions as may be necessary to minimise the effects of any Personal Data Breach including maintaining any record of all information relating to the Personal Data Breach including the results of its investigations and taking all measures as necessary to prevent a future Breach from occurring again.

14 Contacting Us

If you have any questions about Our Sites or this Privacy Policy, please contact Us by email at, catherine.gray@roastandground.co.uk by telephone on 020 8397 8676 or by post at Roast & Ground, Unit 6, Kingston Business Centre, Fullers Way South, Chessington KT9 1DQ. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 4, above).

15 Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Sites and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Sites following the alterations. We recommend that you check this page regularly to keep up-to-date.

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