

## **Privacy Policy**

Costa Express Malaysia Sdn Bhd ("Costa", "We", "Us") is a controller of 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.

An overview of how we use your data is here.

1. Summary of how we use your data and your rights
2. Information we collect from you
3. How we use information and the legal basis
4. Data sharing
5. Data retention
6. Your rights
7. Contact details

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

We use your data to provide and improve our products and services, including for marketing, research, feedback and enquiries, and for safety and security purposes, in furtherance of the requirements of the Personal Data Protection Act 2010. We also use your data when you enter competitions or awards that we organise.

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 Express Malaysia carries out. More information about your rights and how to exercise these is set out in the "Your rights" section of this notice.

For details of how personal data is shared with Costa Express Malaysia, please see the "Data Sharing" section below.

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

We collect information when you enter our contests.

In particular:

- We keep information you give us directly such as contact details (including name, email, address and telephone number), and competition entries.
- We record and analyse store, web and app visits, details of your purchases and where you take advantage of our promotions.
- If you post information online about us or provide feedback, we keep a record.
- If you contact us directly and complain or give feedback, or enter a competition, we will record details and all related information (including that you provide to us) such as emails, letters, phone calls, to our product customer information helplines including those operated by third parties as detailed in Section 5 below.

### 3. **How we use information and the legal basis**

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

- To fulfil a contract, we have with you;
- When it is in our legitimate interest;
- When you consent to it; or
- To comply with the law.

A legitimate interest is when we have a business or commercial reason to use your data. This involves us assessing when we can rely on our legitimate interests.

We have set out below how and why we use your personal information and the legal basis we rely on. This is also where we tell you what our legitimate interests are.

**When you buy something from us, or enter a competition we run, we use your information to fulfil our contract with you.**

We take information to communicate with you, check your identity, and provide products and services, including awarding prizes as when you participate in a competition.

**To run our business and pursue our legitimate interests, we use your information.**

Our legitimate interests include 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 services, developing new products and services, and telling you about them and conducting market research.

**Further details of our legitimate interests:**

To run and promote our business, we use your information:

- **To provide and improve our products and services, and to respond to you if you contact us.**

- **When we monitor Costa websites, social media platforms such as Facebook, Instagram and Twitter. 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.**
- **To run competitions and promotions and track which offers seem of interest to you.**
- **To understand you better as a customer by analysing your information you provide to us or which we learn through your interactions with us.**
- **To administer and run our competitions, and to promote the competition through the publishing of winner's details.**

To prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, including where we are required to do so by law, we use other organisations to check the validity of the contact details you use to participate (for further details see “Data sharing” below).

To comply with law, assess and uphold legal or contractual rights and claims, and for monitoring, auditing and training on compliance matters we verify your identity in certain circumstances.

If you give us consent, we:

- Send you electronic marketing, including promotions and offers, in relation to our products and services
- Use cookies or similar technologies on the website, app and in marketing emails, including analytic cookies.
- 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 <https://www.facebook.com/CostaCoffeeMalaysia>. 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, including when you ask to unsubscribe from our marketing communications.**

#### **4. Data Sharing**

For some activities Costa uses third party service providers, our online order fulfilment partner needs information such as your name, contact details, address, and the items you have purchased to manage any complaints, comments or queries you submit to us regarding your online purchase.

In addition to using, we use third party providers for the following services:

- **Sending promotional offers**
- **Customer feedback surveys**
- **Online order fulfilment, including the management of queries, concerns or complaints related to your order(s)**
- **Data analysis to enable us to optimise our services (including locations and products) Gift cards (including E-Gifts)**
- **IT development, support, maintenance and hosting, including the provision of applications and website hosting**
- **Administration of our competitions and run our competitions, and to promote the competition through the publishing of winner's details.**

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.

#### **5. Data retention**

We keep your data to enable us to fulfil our contract with you or to provide services, to enable us to facilitate the provision of products and to administer and promote our competitions or where required by law or to protect legal rights.

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 required for competition participations.**
- **Information to maintain records according to rules that apply to us.**

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

#### **6. 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;
- 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;

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. On occasion there may be a compelling legitimate interest to keep processing 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.

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.

## **7. Which Costa entity is the controller?**

The controller for your information is Costa Express Malaysia Sdn Bhd, Level 23, Nu Tower 2, Jalan Tun Sambathan, Kuala Lumpur Sentral, 50470 Kuala Lumpur.

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 Express.

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.