

Kyon Limited Privacy Policy

Kyon Limited and its affiliates (collectively, “Kyon Drinks”, “we”, “us” or “our”) operate our websites, and mobile apps.

This Privacy Statement pertains to the personal information we collect or generate about our customers on our websites, or via mobile apps. This Privacy Statement describes the types of information we collect, and how your information is used, shared and protected. It also explains the choices you have relating to your information and how you can contact us.

The Kyon Drinks entity responsible for processing your information (the “data controller”) will depend on where you are located. Refer to Appendix A for information about the data controllers. Please note that Kyon Drinks is a trading name of the data controller.

We are committed to protecting and respecting your privacy.

During the course of our activities we will collect, store and process personal information about our customers, suppliers and other third parties, and we recognise that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.

This policy sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

For the purpose of UK data protection laws, the Data Controller is Kyon Limited of Melbury House, 34 Southborough Road Bromley Kent BR1 2HH.

Privacy Policy Updated 01 September 2020

Cookie Policy

Our website uses encrypted cookies to distinguish you from other users on our site. This helps us to provide you with a good experience when you browse our website and also allows us to make improvements to our site. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies

Type	Information
Strictly necessary cookies	These are cookies that are required for the operation of our website. These include, for example, cookies that enable you to log into the secure areas of our website, use a shopping cart or make use of billing services.
Analytical performance cookies	These allow us to recognise and count the number of visitors to our website and understand how visitors move around when they are using it. This helps us to identify issues with our site and improve the way our website works.
Functionality cookies	These are used to recognise you when you return to our website. This enables us to personalise our content to you, greet you by name and remember your preferences (for example, your choice of language or region).
Targeting cookies	These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.
Re-marketing cookies	So you can easily "Like" or share our content, we have included sharing buttons on our websites for certain social media sites such as Facebook and Twitter. These cookies are set by the third-party social media sites to which they relate, including: <ul style="list-style-type: none"> • Facebook • Instagram

Managing Cookie Use

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) please note that some parts of our website may become inaccessible or not function properly.

We use the following cookies

Type	Information
Strictly necessary cookies	Duration: 12 Months Purpose: These are cookies that are required for the operation of our website. These include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of billing services. Examples: <ul style="list-style-type: none"> ● Kyon Website Cookies ● Google Tag Manager
Analytical/performance cookies	Duration: 12 Months Purpose: They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to identify issues with our site and improve the way our website works. Examples: <ul style="list-style-type: none"> ● Google Analytics
Functionality cookies	Duration: 12 Months Purpose: These are used to recognise you when you return to our website. This enables us to personalise our content to you, greet you by name and remember your preferences (for example, your choice of language or region).
Targeting and remarketing cookies	Duration: 24 Months Purpose: These cookies record your visit to our website, the pages you have visited and

	<p>the links you've followed. We'll use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.</p> <p>Examples:</p> <ul style="list-style-type: none"> ● Google Adwords ● Facebook ● Instagram
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Please note that the exact names may change from time to time and there may be a slight delay in the table being updated. Third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical / performance cookies or targeting remarketing cookies.

A full list of our Cookies

Name	Type
Bing	Targeting
Instagram	Social Media
Google Tag Manager	Essential
Facebook	Social Media
Twitter	Social Media
Google Adwords Remarketing	Targeting
Google Adwords Conversion	Analytical/Performance
Google Analytics	Analytical/Performance

Google Floodlight	Analytical/Performance
Google My Business	Reviews

You have the ability to accept or decline cookies by modifying the settings in your browser. The majority of browsers will allow the user to alter the settings used for cookies. The help menu on your browser will have further details. You may also notice that some cookies that are not related to Kyon Drinks, and are in fact third party cookies. As we are unable to control these cookies, we would encourage you to look at the third-party's website for more information about their cookies, you will find the links to the companies in the table above.

To manage cookies, you can use your browser to do this. Each browser is different, so check the 'Help' menu of your particular browser to learn how to change your cookie preferences. If you want more information each browser visit the sites below.

- Google Chrome
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari](#)
- [Opera](#)
- [Google Analytics Opt-Out](#)

If you wish to manage your cookies direct with the companies find out more here:

- Facebook
- [Twitter](#)
- [Google](#)

In the event that Kyon Drinks is sold or integrated with another business, your details may be disclosed to our advisors and any prospective purchasers and their advisors and will be passed on to the new owners of the business.

Updating your Personal Details

If any of the information that you've provided to us has changed, e.g. you change your email address, name or payment details, let us know by emailing sales@kyondrinks.com, or sending a letter to Kyon Drinks, Customer Services, Melbury House, 34 ,Southborough, Bromley Kent, BR1 2HH UK. If you have an account with us, you can edit your details by logging into your account.

Information Disclosure

We comply with and are registered under the Data Protection laws in the United Kingdom. We take all reasonable care to prevent any unauthorised access to and use of your personal data. We maintain a responsibility to keep your information confidential and will only use it to offer relevant products and services to you. We'd also like to send you information about special features of our website or any other service or products we think may be of interest to you. If you do not wish to receive any mailings, email sales@kyondrinks.com with your email address, customer number or name and address details.

Updates to our Cookies Policy

Any changes to this cookie policy in the future will be posted on this page and we will take all measures necessary to communicate any changes in this cookie policy to you. Please check back frequently to see any updates or changes to this cookies policy.

Advertisements

Advertisements on our site are provided by another organisation. Our advertising partner will serve ads that it believes are most likely to be of interest to you, based on information about your visit to this and other websites.

Data Protection Principles

When processing your information, we must comply with the six enforceable principles of good practice. These provide that your personal information must be:

- processed lawfully, fairly and in a transparent manner,
- processed for specified, explicit and legitimate purposes,
- adequate, relevant and limited to what is necessary,
- accurate and kept up-to-date,
- kept for no longer than is necessary, and
- processed in a manner than ensures appropriate security.

How we protect and use your Information

We may collect, use, store and transfer different kinds of personal information about you, including:

- Identity Data, such as your name, title and date of birth,
- Account Identity Data, such as your email address and your password,
- Contact Data, such as your billing address, delivery address, email address and telephone numbers,
- Financial Data, such as bank account and payment card details,

- Transaction Data, including details about payments to and from you, and other details of products you purchase from us,
- Technical Data, including IP addresses, your log-in 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 our website,
- Profile Data, including purchases or orders made by you, feedback and survey responses,
- Usage Data, including information about how you use our website, products and services, and
- Marketing Data, such as your preferences in receiving marketing from us and our third parties, and your communication preferences.

'Special Category' Data

Information relating to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, criminal convictions, sex life or sexual orientation, or certain types of genetic or biometric data is known as 'special category' data.

During the course of dealing with you, we do not expect to collect any 'special category' data about you.

We may obtain personal information by directly interacting with you, such as:

- placing orders for products via our website,
- creating an account on our website,
- participating in discussion boards or other social media functions on our website,
- browsing our website while logged into your Kyon Account,
- entering a competition, promotion or survey organised by us, or otherwise providing us with feedback,
- subscribing to our publications, or otherwise requesting marketing material to be sent to you, or

- corresponding with us by phone, email, letters or otherwise.

We may obtain personal information via automated technology when you interact with our website by using cookies, server logs and other similar technologies.

We may also collect personal information about you from third parties or publicly-available sources, such as:

- analytics providers (such as Google),
- credit reference and fraud prevention agencies,
- providers of technical, payment and delivery services

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- you have given us consent,
- we need to perform a contract we are about to enter into, or have entered into, with you,
- where it is necessary for our or a third party's legitimate interests, and your interests and rights do not override those interests, or
- where we need to comply with a legal or regulatory obligation.

We do not use 'special category' information.

- Companies House, LinkedIn and the electoral register.

We may use your personal information for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

Purposes for which we will use the information you give us	Legal Basis
To register you as a new customer	It will be necessary for the performance of the contract between you and us
To process your order and, if accepted, to	It will be necessary for the performance of

deliver the products to you (including managing payments, fees, charges and accurate data	the contract between you and us
To manage your queries or complaints	It will be necessary for the performance of the contract between you and us
To collect and recover money owed to us	It will be necessary for our legitimate business interests, namely to ensure we receive payment for products and services that you have ordered from us
To notify you about changes to our terms of sale or this privacy policy	It will be necessary for our legitimate business interests, namely to ensure you are aware of our current terms and conditions
To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, to allow you to participate in interactive features of our service, when you choose to do so, to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you and to make suggestions and recommendations to you and other users of our website about goods or services that may interest you or them	It will be necessary for our legitimate business interests to ensure you receive the best experience possible when accessing and using our website. We will comply with our cookie policy when processing this information
To enable you to participate in a prize draw, competition or complete a survey	It will be necessary for our legitimate business interests, namely to study how customers use our products, to develop them and help grow our business
To create customer profile types that are used to help identify new customers from other sources. These profiles do not contain personal data.	This will be done after you give your consent for us to do. Your consent can be withdrawn by changing your preferences using the My Account functionality on our website.
To provide you with relevant marketing communications that inform you of special offers, sales and new products.	It will be necessary for our legitimate interest to develop our offers and services in order to improve customer interaction and retain customers.
To prevent customers from trading with	It will be necessary for our legitimate

<p>Kyon Drinks who have been abusive or who have abused or misused the products and/or services that we supply.</p>	<p>business interests, namely to prevent the misuse of our products or services</p>
<p>To detect, investigate and prevent crime and where necessary to prevent customers from trading with Kyon Drinks who have been fraudulent and to pass their details on to the relevant legal/regulatory organisation.</p>	<p>It will be necessary for our legitimate business interests, namely to help prevent fraudulent or dishonest behaviour, and to comply with any legal obligations placed upon us (e.g. such as by a regulator).</p>
<p>To notify you when you have products in your basket that have not been through the ordering process</p>	<p>It will be necessary for our legitimate business interests, namely to ensure we provide the quality of service you expect from us</p>
<p>(Where goods and/or services are being provided to Kyon Drinks). To have a contractual relation with you to supply goods and/or service.</p>	<p>It will be necessary for our legitimate business interests, in order to fulfil our contractual obligations.</p>
<p>To contact you to undertake customer satisfaction surveys, invite you to provide product reviews or for market research.</p>	<p>It will be necessary for our legitimate business interests, namely to develop products, services, applications and designs that attract and retain customers, improving customer interaction with our sites.</p>
<p>To comply with our legal and regulatory obligations for the payment of tax</p> <p>We will only use your personal information for the purpose(s) 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 we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.</p> <p>Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.</p>	<p>It will be necessary for us to comply with a legal obligation to which we are subject</p>

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We will only use your personal information for the purpose(s) 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 we need to use your personal information 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 information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Refusal of Personal Information

It is a contractual requirement for you to provide us with certain information, namely your name, delivery address, phone number and email address. During the ordering process you will be required to provide payment information to our chosen payment service provider. We do not hold any of your bank or credit/payment card details. If you do not provide us or the payment service provider with that information, we may be unable to accept and process your order and deliver the products to you, and/or we may have to cancel your order. You may also be liable to pay additional costs, as explained in paragraph 8.18 of our terms of sale.

Disclosure Of Your Information

We may share your personal data with trusted third parties. For example, to deliver your orders, to handle complaints, for fraud management, to help us personalise our offers to you and so on.

This is the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- We require all third parties to respect the security of your personal information and to treat it in accordance with the law.
- We do not allow our third-party service providers to use your personal information for their own purposes and only permit them to process your

personal information for specified purposes and in accordance with our instructions.

- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Third parties we work with

<p>Courier Services</p>	<p>Delivery of your orders, including proof of delivery and tracking information. Depending on the service chosen this will be one of APC Overnight, Royal Mail, Parcel Force, UPS; or some others we may sign up with from time to time.</p>
<p>Data Insight</p>	<p>Behavioural analysis that allows us to personalise your experience and the information we provide to you. We use Google Analytics, Google Big Query, RedEye, Qubit and The Blueberry Wave.</p>
<p>Email Services</p>	<p>How we manage our electronic communication with you. This is done through Google</p>
<p>Fraud services and Fraud Management</p>	<hr/> <p>We may use a combination of Experian, Equifax, DWP, Citizens Advice Bureau and the Police when fulfilling our 'public interest' and legal responsibilities to prevent fraud and dishonest behaviour.</p> <p>We may share information about fraudulent or potentially fraudulent activity in our premises or systems. This</p>

	<p>may include sharing data about individuals with law enforcement bodies.</p>
IT Services	<p>We use a number of partners to support our website and other business systems but only share your information with Google</p>
Legal Services	<p>When necessary we will enlist the help of our external solicitors for resolution of legal matters.</p>
Mailing Services	<p>We work mainly with APC Overnight but may also deliver through Royal Mail and Parcel Force</p>
Payment Services	<p>During the payment process you will be directed to options to Stripe, PayPal depending on your preference.</p>
Market Research services	<p>Should you wish to comment on our products or service you will be able to do so via our chosen review service provider, Reviews on My Website Dot Com</p>
Social Media	<p>So we can show you products that might interest you while you are browsing the internet, we use the services of Google, Facebook and Instagram.</p>
Law enforcement	<p>We may be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.</p>

Regulatory bodies	When appropriate your personal information may be shared with HM Revenue & Customs, the UK Information Commissioner's Office, regulators and other authorities who require reporting of processing activities in certain circumstances.
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We may also disclose your information to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this policy.

Personal Information Storage

All information you provide to us is stored on our secure servers in the United Kingdom, or within the EU.

We will take all steps reasonably necessary to ensure that your data is treated securely, including a formal review of the security provisions of 3rd party Data Controllers we use, including taking the following safeguards:

- Network security. We deploy security and monitoring tools that restrict access and alert us to any unauthorised behaviour on our network and systems.
- Data Transfers. All data transfers are carried out using multi-layered security measures to ensure data integrity and privacy.
- Firewalls and encryption. We apply industry-standard firewall protection and use up to date, not compromised, encryption technology.
- Auditing and Testing. We carry out regular penetration testing and employ ethical hackers to ensure our infrastructure is secure and any intrusion would be quickly detected.
- PCI DSS standards. We comply with the Payment Card Industry Data Security Standards in relation to debit/credit card payments made on our website.

- Building entry controls. Our premises and those of the 3rd parties we use are access controlled and monitored always, with on-site security and CCTV traceability.
- Secure lockable desks and cupboards. Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- Methods of disposal. Paper documents are disposed of by shredding in a manner that ensures confidentiality
- Access and control. We maintain strictly controlled access to systems and data based on the authorised roles of staff.
- Training. We ensure our employees are trained in the importance of data security.
- Overseas transfers. Whenever we transfer your personal information outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring that we apply appropriate safeguards (either by transferring data only to recipients in the European Union, to recipients in countries approved by the European Commission, to recipients that are party to the EU-US Privacy Shield, or by using specific contracts approved by the European Commission).

If you are concerned about the levels of data security in any of those countries, please let us know and we will endeavour to advise what steps will be taken to protect your data when stored overseas.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

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

The length of time that we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

Legal Basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations
Where we use/store your data because it is in the public interest	We will use/store your data for as long as it remains a matter of public interest for us to do so. The law sets out what matters are considered to be in the public interest, and we will use/store your data in accordance with those requirements
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use and store your data for as long as it is necessary for the performance of the contract between you and us (or, if earlier, we no longer have a legitimate interest in using/storing your data)
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitive of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements, for example, we will retain information relating to orders you place with us for 6 years so we can meet our statutory obligations.

Your Rights

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a right to access the information we hold about you free-of-charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the right to ask us to rectify any information we hold about you that is inaccurate or incomplete.
- You have the right to ask us to erase the information we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the right to ask us to stop using your information where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the right to ask us to transmit the information we hold about you to another person or company in a structured, commonly-used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the right to object to us using/storing your information. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.

- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the right to withdraw your consent at any time.
- You have the right to object to us using/storing your information for direct marketing purposes.

If you wish to exercise any of your legal rights, please contact our customer services team by writing to the address at the top of this policy, or by emailing us at sales@kyondrinks.com.

You also have the right, at any time, to lodge a complaint with the UK Information Commissioner's Office if you believe we are not complying with the laws and regulations relating to the use/storage of the information you give us, or that we collect about you.

Opting Out Of Receiving Marketing Communications

You can ask us to stop sending you marketing communications at any time by:

- Using the unsubscribe link in our emails.
- My Account holders can update their preferences on the website.
- Contacting our customer services team by:
 - Writing to the address at the top of this policy,
 - Phoning us,
 - Emailing us at sales@kyondrinks.com.

Automated Decision-making

We may undertake 'profiling' to ensure you only receive information that we believe is relevant to you (for example, where we had a special offer that was relevant only to young adults under the age of 25, we would profile those of our customers to whom we can legitimately send marketing emails to ensure that the marketing email is sent only to appropriate recipients).

We may undertake credit reference checks with Experian.

Otherwise, we do not make any decisions that produce legal effects concerning you, or which would otherwise significantly affect you, by means of an automated decision-making process.

Links to Third Parties

Our website 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 and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Changes & Updates To Our Policy

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by email or via social media. Please check our website frequently to see any updates or changes to our policy.

Contact

Questions, comments and requests regarding this policy are welcomed and should be addressed to our customer services team by writing to the address at the top of this policy, or by emailing us at sales@kyondrinks.com.