## NORMAN'S CAFÉ PRIVACY NOTICE

Last updated February 2024

This Privacy Policy describes how Norman's Cafe (the "Site" or "we") collects, uses, and discloses your Personal Information when you visit or make a purchase from the Site.

### **Collecting Personal Information**

When you visit the Site, we collect certain information about your device, your interaction with the Site, and information necessary to process your purchases. We may also collect additional information if you contact us for customer support.

In this Privacy Policy, we refer to any information that can uniquely identify an individual (including the information below) as "Personal Information". See the list below for more information about what Personal Information we collect and why.

#### **Device Information**

- Examples of Personal Information collected: version of web browser, IP address, time zone, cookie information, what sites or products you view, search terms, and how you interact with the Site.
- Purpose of collection: to load the Site accurately for you, and to perform analytics on Site usage to optimize our Site.
- Source of collection: Collected automatically when you access our Site using cookies, log files, web beacons, tags, or pixels
- Disclosure for a business purpose: shared with our processors Shopify & PayPal

#### Order information

- Examples of Personal Information collected: name, billing address, shipping address, payment information (including credit card numbers, email address, and phone number.
- Purpose of collection: to provide products or services to you to fulfil our contract, to process your payment information, arrange for shipping, and provide you with invoices and/or order confirmations, communicate with you, screen our orders for potential risk or fraud, and when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.
- Source of collection: collected from you.
- Disclosure for a business purpose: shared with our processors Shopify or PayPal

## <u>Customer support information</u>

- Examples of Personal Information collected: name, billing address, shipping address, email address, and phone number.
- Purpose of collection: to provide customer support.
- Source of collection: collected from you.

- Disclosure for a business purpose: None

# **Sharing Personal Information**

We share your Personal Information with service providers to help us provide our services and fulfill our contracts with you, as described above. For example:

- We use Shopify to power our online store. You can read more about how Shopify uses your Personal Information here: https://www.shopify.com/legal/privacy.
- We may share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

### **Behavioural Advertising**

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you.

## For example:

- We use Google Analytics to help us understand how our customers use the Site. You can read more about how Google uses your Personal Information here: https://policies.google.com/privacy?hl=en. You can also opt-out of Google Analytics here: https://tools.google.com/dlpage/gaoptout.
- We share information about your use of the Site, your purchases, and your interaction with our ads on other websites with our advertising partners (such as Facebook). We collect and share some of this information directly with our advertising partners, and in some cases through the use of cookies or other similar technologies (which you may consent to, depending on your location).

For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page

at http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work.

You can opt out of targeted advertising by:

FACEBOOK - https://www.facebook.com/settings/?tab=ads GOOGLE - https://www.google.com/settings/ads/anonymous

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <a href="http://optout.aboutads.info/">http://optout.aboutads.info/</a>.

### <u>Using Personal Information</u>

We use your personal Information to provide our services to you, which includes: offering products for sale, processing payments, shipping and fulfilment of your order, and keeping you up to date on new products, services, and offers.

#### Lawful basis

Pursuant to the General Data Protection Regulation ("GDPR"), if you are a resident of the European Economic Area ("EEA"), we process your personal information under the following lawful bases:

**Your consent;** In some cases, we may rely on your consent to process personal data. Where we rely on consent, you have the right to withdraw your consent at any time. Please note that withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

The performance of the contract between you and the Site; We process personal data to fulfill our contractual obligations and provide the services requested by our customers. This includes processing personal data necessary for the management of orders, delivery of products, and customer support.

**Legal obligation;** We may process personal data to comply with legal obligations to which we are subject, such as tax or accounting requirements, or to respond to lawful requests by public authorities.

**Legitimate interests;** We may process personal data to comply with legal obligations to which we are subject, such as tax or accounting requirements, or to respond to lawful requests by public authorities.

We ensure that the processing of personal data is always proportionate to the purposes for which it is carried out, and that individuals' rights are respected at all times.

### **Retention**

When you place an order through the Site, we will retain your Personal Information for our records for as long as is necessary until you ask us to erase this information. For more information on your right of erasure, please see the 'Your rights' section below.

# Automated decision-making

If you are a resident of the EEA, you have the right to object to processing based solely on automated decision-making (which includes profiling), when that decision-making has a legal effect on you or otherwise significantly affects you.

We *DO NOT* engage in fully automated decision-making that has a legal or otherwise significant effect using customer data.

Our processor Shopify uses limited automated decision-making to prevent fraud that does not have a legal or otherwise significant effect on you.

Services that include elements of automated decision-making include:

- Temporary denylist of IP addresses associated with repeated failed transactions. This denylist persists for a small number of hours.
- Temporary denylist of credit cards associated with denylisted IP addresses. This denylist persists for a small number of days.

## Your rights - GDPR

If you are a resident of the EEA, you have the right to access the Personal Information we hold about you, to port it to a new service, and to ask that your Personal Information be corrected, updated, or erased. If you would like to exercise these rights, please contact us through the contact information below

#### Do Not Track

Please note that because there is no consistent industry understanding of how to respond to "Do Not Track" signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

# **Changes**

We may update this Privacy Policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons.

#### **Contact**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us through:

Email: Hello@normanscafe.com

Address: 167 Junction Road, Tufnell Park, London, N19 5PZ

You also have the right to complain direct to the Information Commissioners Officer: https://ico.org.uk/