

PRIVACY POLICY

Last updated - 10th February 2023.

Welcome to **Victoria Roaster**.

Victoria Roaster, having its corporate office address at 1107 Collingwood Ln Alpharetta GA 30022 USA, is a registered Company in the State of Georgia, United States of America (hereinafter also referred to as “**Company**”, “**we**”, “**our**” or “**us**”), operates _____ (“**Website**” or “**Platform**”). This Website focuses on the sale of roasting machines for green coffee beans. In addition, unroasted and roasted coffee beans are distributed. Our strategy is to simplify the connection between the coffee producer and the consumer via our Website, as well as to provide the option of purchasing roasting equipment (hereinafter referred to as “**Service**”).

Our Privacy Policy (“**Policy**”) governs your visit to our Website and explains how we collect, safeguard and disclose information that results from your use of our Service.

We take your privacy very seriously. In this Policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this Policy that you do not agree with, please discontinue the use of our Services immediately. We use your data to provide and improve Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Policy, the terms used in this Policy have the same meanings as in our Terms and Conditions.

Our Terms and Conditions (“**Terms**”) govern all use of our Service and together with the Policy constitute your agreement with us (“**Agreement**”).

If this Policy is modified in any way, it will be updated here. Regularly checking and reviewing this page ensures that you are updated on the information which may be collected, used (and under what circumstances), and if it may be shared with other parties (if at all). If we believe that

the modifications are material, we will notify you of the changes by posting a notice on the Website, or emailing you at the email address provided to us by you, and as we may deem appropriate. What constitutes a material change will be determined by us, at our sole and absolute discretion. In this Policy "you", "your" or "Users" refers to the users of the Platform.

WHAT INFORMATION DO WE COLLECT?

1. The personal information you disclose to us

In Short: We collect information that you provide to us.

We collect personal information that you voluntarily provide to us when you visit the Website, express an interest in obtaining information about us or our products and Services or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Website. The personal information we collect may include the following:

- First Name
- Last Name
- Email Address
- Phone Number
- TDC Data

2. Information automatically collected

In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Website.

When you access our Website, we, our service providers and our partners may automatically collect information about you, your computer or mobile device, and your activity on our Website. Typically, this information includes your computer or mobile device operating system type and version number, manufacturer and model, device

identifier (such as the Google Advertising ID or Apple ID for Advertising), browser type, screen resolution, IP address, the website you visited before browsing to our website, general location information such as city, state or geographic area; and information about your use of and actions on or in our Website, such as pages or screens you accessed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access.

Our service providers and business partners may collect this type of information over time and across third-party websites. This information is collected via various mechanisms, such as cookies, web beacons, embedded scripts, our Website, and similar technologies. This type of information may also be collected when you read our HTML-enabled emails.

The information we collect includes:

- **Log and Usage Data.** Log and usage data are service-related, diagnostic usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings and information about your activity on the Website (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).
- **Device Data.** We collect device data such as information about your computer, phone, tablet or other devices you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, and operating system configuration information.

- **Location Data.** We collect information data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type of settings of the device you use to access the Website. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Locations settings on your device. Note however, if you choose to opt-out, you may not be able to use certain aspects of the Services.

HOW DO WE USE COOKIES?

We may use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies may also be used such as pixel tags, remarking tags and tag managers to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Please refer to our [Cookie Policy](#).

HOW DO WE USE YOUR INFORMATION?

***In Short:** We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our

legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

1. **To facilitate account creation and logon process.** We use the information you allowed us to collect to facilitate account creation and logon processes for the performance of the contract
2. **Request feedback.** We may use your information to request feedback and to contact you about your use of our Website.
3. **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
4. **To send administrative information to you.** We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.
5. **To protect our Services.** We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention).
6. **To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.**
7. **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
8. **Fulfill and manage your orders.** We may use your information to fulfil and manage your orders, payments, returns, and exchanges made through the Website.
9. **To deliver and facilitate the delivery of services to the user.** We may use your information to provide you with the requested service.

10. **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
11. **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Website, subscribing to marketing or otherwise contacting us, we will collect personal information from you. You can opt out of our marketing emails at any time by unsubscribing.
12. **Advertising to you.** We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations.*

We may process or share the data that we hold based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal processes, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third-party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Website, which will enable them to collect data on our behalf about how you interact with our Website over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages or features, and better understand online activity. Unless described in this notice, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- **Third-Party Advertisers:** We may use third-party advertising companies to serve ads when you visit or use the Website. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you. For Example Google Analytics
- **Affiliates:** We may share your information with our affiliates, in which case we will require those affiliates to honor this Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

- **Business Partners:** The term Business Partners includes “Teachers” and “Supporting Staff”. We may share your information with our business partners to offer you certain products, services or promotions.
- **Other Users.** When you share personal information (for example, by posting comments, contributions or other content to the Website) or otherwise interact with public areas of the Website, such personal information may be viewed by all users and may be publicly made available outside the Website in perpetuity. If you interact with other users of our Website and register for our Website through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Website, and view your profile.

WHO WILL YOUR INFORMATION BE SHARED WITH?

In Short: We only share information with the following third parties.

We only share and disclose your information with the following third parties. We have categorized each party so that you may easily understand the purpose of our data collection and processing practices. If we have processed your data based on your consent and you wish to revoke your consent, please contact us using the contact details provided in the section below titled "HOW CAN YOU CONTACT US ?".

- **Advertising, Direct Marketing, and Lead Generation**
 - Google Analytics

We may use third-party Service Providers to monitor and analyse the use of our Service.

Google Analytics: Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google

Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

***In Short:** We are not responsible for the safety of any information that you share with third-party providers who advertise, but are not affiliated with, our Website.*

The Website may contain/use third parties links/services and which may link to other websites like Instagram, Facebook, MailChimp etc. We cannot guarantee the safety and privacy of the data you provide to any third parties. Any data collected by third parties is not covered by this Policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Website. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

WE HEREBY DISCLAIM LIABILITY FOR, ANY INFORMATION, MATERIALS, PRODUCTS, OR SERVICES POSTED OR OFFERED AT ANY OF THE THIRD-PARTY SITES LINKED TO THIS WEBSITE. BY CREATING A LINK TO A THIRD-PARTY WEBSITE, WE DO NOT ENDORSE OR RECOMMEND ANY PRODUCTS OR SERVICES OFFERED OR INFORMATION CONTAINED ON THAT WEBSITE, NOR ARE WE LIABLE FOR ANY FAILURE OF PRODUCTS OR SERVICES OFFERED OR ADVERTISED AT THOSE SITES. SUCH A THIRD PARTY MAY HAVE A PRIVACY POLICY DIFFERENT FROM THAT OF OURS AND THE THIRD-PARTY WEBSITE MAY PROVIDE LESS SECURITY THAN THIS SITE.

HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:** We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this Policy unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this Policy will require us to keep your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:** We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, the transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

YOUR DATA PROTECTION RIGHTS UNDER THE CALIFORNIA PRIVACY PROTECTION ACT (CalOPPA).

According to CalOPPA, we agree to the following:

1. our Privacy Policy link includes the word “Privacy”, and can easily be found on the home page of our website;
2. users will be notified of any privacy policy changes on our Privacy Policy Page;
3. users are able to change their personal information by emailing us at _____.

Our Policy on “**Do Not Track**” Signals:

We honor Do Not Track signals and do not track, plant cookies, or use advertising when a Do Not Track browser mechanism is in place. Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

YOUR DATA PROTECTION RIGHTS ARE UNDER THE CALIFORNIA CONSUMER PRIVACY ACT (CCPA).

The California Code of Regulations defines a “**resident**” as:

- a. every individual who is in the State of California for other than a temporary or transitory purpose and

- b. every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose
- c. All other individuals are defined as "**non-residents.**"
- d. If this definition of "resident" applies to you, certain rights and obligations apply regarding your personal information.

1. Your rights with respect to your personal data

a. Right to request deletion of the data - Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

b. Right to be informed - Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell your personal information to third parties;
- the categories of personal information that we sold or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold or disclosed for
- a business purpose; and
- the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request

c. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

d. Other privacy rights

- you may object to the processing of your personal data.
- you may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data.
- you can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.
- you may request to opt-out from future selling of your personal information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.

To exercise these rights, you can contact us by referring to the contact details at the bottom of this document. If you have a complaint about how we handle your data, we would like to hear from you.

Your data protection rights, described above, are covered by the CCPA, short for the California Consumer Privacy Act. To find out more, visit the official California Legislative Information website. The CCPA took effect on 01/01/2020.

DELETION OF ACCOUNT AND DATA

If you no longer wish to use our services, you may be able to delete your account and data with us. If you can delete your own account, that setting is available to you in your account settings. Otherwise, please contact us.

PAYMENTS

We provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. Stripe).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

CHILDREN’S PRIVACY

Our Services are for the use of children below the age of 18, without parental consent (“**Child**” or “**Children**”).

We do not knowingly collect personally identifiable information from Children under 18 without parental consent. If you become aware that a Child has provided us with Personal Data without the parent's consent, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take steps to remove that information from our servers.

COMPLAINTS

You can notify us of any complaint you may have about our handling of your personal information via '**Contact us**'. We will endeavour to reply to you within 30 days of receipt of the complaint, and we hope that we will be able to resolve any complaints you may have without needing to involve third parties.

DO WE MAKE UPDATES TO THIS NOTICE?

***In Short:** Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this privacy notice from time to time. The updated version will be indicated by an updated “**Last updated**” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We

encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

HOW CAN YOU CONTACT US?

If you have questions or comments about this notice, you may email us at.

Email: _____