Privacy Policy for Specialty Coffee Association

INTRODUCTION

Specialty Coffee Association (SCA) is committed to protecting your personal information when you use our services. This Privacy Policy will tell you about your privacy rights and how the law protects you.

This Privacy Policy relates to us using any personal information that we collect from you via the following online services:

- Other SCA owned websites: www.scaa.org; www.scacoffee.kr
- Other third-party websites we use: www.scae.com
- Social media or official SCA content on other websites
- Mobile device applications (apps).

It also relates to us using any personal information that you provide by phone, SMS, email, in letters and other correspondence, and in person.

This Privacy Policy is provided in a layered format so you can click through to the specific area set out below. Alternatively, you can download a PDF version at www.sca.coffee. This Privacy Policy explains the following:

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IMPORTANT INFORMATION AND WHO WE ARE

Important information

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so you are fully aware of how and why we are using your data.

This privacy notice aims to give you information on how SCA collects and processes your personal data through your use of this Website, our social media or our app.

This Website is not intended for children and we do not knowingly collect data relating to children.

About us

Our full details are:

Full name of legal entity: Association for Specialty Coffee (DBA Speciality Coffee Association and known as SCA), a company registered in California, USA as a non-profit organization, exempt from tax under IRC 501(c)(6) under company number C1701045.

Name of Data Protection Officer: David Hewitt

Email Address: dataprotection@sca.coffee

Postal Address: 117 West 4th Street, Suite 300, Santa Ana, CA 92701

Telephone Number: +1 562 624 4100

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

If you wish to learn more about the SCA and what we do please visit: www.sca.coffee/about.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on 25/05/2018. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.
THIRD-PARTY LINKS

This Website may contain hyperlinks 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 applications and are not responsible for their privacy statements. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such sites is at your own risk.

These third-party websites and applications have their own privacy policies, and also likely use cookies, so we urge you to review them.

WHAT INFORMATION WE MAY COLLECT ABOUT YOU AND WHY

What types of personal data do we collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together below:

- **Identity Data** which includes your first name, maiden name, last name, username or similar identifier. It also includes your marital status, title, date of birth, gender, nationality, profession.
- **Contact Data** which includes your billing address, postal address, email address and telephone number.
- **Financial Data** which includes payment card details
- **Transaction Data** which includes details about payments to and from you and other details of products and services you have purchased from us
- **Technical Data** which includes internet protocol (IP) address, your login 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 this website, our social media or our app.
- **Profile Data** which includes your username and password, purchases or orders made by you, your preferences, your feedback and survey responses.
- **Usage Data** which includes information about how you use our website, social media pages and app. It also includes information about how you use our products and services.
- **Marketing and Communications Data** which includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We use the above data for delivering products and services as part of your involvement with SCA either as a member or participant.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature.
However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel the service you have with us but we will notify you if this is the case at the time.

**Sensitive Personal Data**

Please note that we may need additional, sensitive or ‘special categories’ of personal information from you such as ethnic origin or health (e.g. if you’re applying to join one of our programmes or applying for a job). In these circumstances, we will only collect this information with your express permission and we will explain further why we are collecting your information and how we will use it.

You have additional rights regarding special categories of personal data. Information regarding this can be found here.

**Data from third parties**

When providing personalised services, we may ask your permission to review third-party data about you, such as your Twitter or Facebook feeds, to get to know you better and to provide more effective personalisation.

Some of our services enable you to sign-in via a third-party service, such as LinkedIn. If you choose to sign-in via a third-party app, you will be presented with a dialog box asking for your permission to allow SCA to access your personal information (e.g. your full name, email address and any other information you have made publicly accessible). Please note that any information not required by the particular service you have opted to use won’t be retained by SCA.

SCA collects information about how you use SCA mobile apps, Websites or other coffee-related online content, and the device(s) you use to access these services. This includes collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the web. For more information, Please see our Cookies Policy for further details.

**HOW WE WILL COLLECT YOUR PERSONAL DATA**

We use different methods to collect data from you and about you. These include:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - Apply for or purchase our products, services or our programmes;
  - Participate or access any of our services;
  - Create an account on our website;
  - Partake in activities or online content such as newsletters, competitions, live chats and webinars;
• **Automated technologies or interactions.** As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our Cookies Policy for further details.

• **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below
  o Technical Data from the following parties:
    ▪ analytics providers such as Google based outside the EU;
    ▪ advertising networks such as Facebook based outside the EU;
    ▪ search information providers such as LinkedIn based outside the EU
  o Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as MemberSuite, SagePay, Stripe, Square and PayPal based outside the EU.
  o Identity and Contact Data from engagement tools/services such as Shopify, SalesVu, Survey Monkey, Wufoo and TypeForm based outside the EU.
  o Identity and Contact Data from data brokers or aggregators.
  o Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

**HOW WILL WE USE YOUR PERSONAL DATA?**

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

• To perform the contract we are about to enter into or have entered into with you;
• Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and/or
• Where we need to comply with a legal or regulatory obligation.

To identify and prevent fraud Please see the purposes for which we will use your personal data section below to find out more about the types of lawful basis that we will rely on to process your personal data.

**PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. The table also sets out what type of personal data is used, please refer to what types of personal data we may collect (above) for information on the type of personal data.
Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at dataprotection@sca.coffee if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.
<table>
<thead>
<tr>
<th>Purpose/Activity</th>
<th>Type of personal data</th>
<th>Lawful basis for processing</th>
</tr>
</thead>
<tbody>
<tr>
<td>To register you as a new user</td>
<td>• Identity • Contact • Financial</td>
<td>Performance of a contract with you</td>
</tr>
<tr>
<td>To provide you with information about our programmes including updates on upcoming events, course details and other information that may be relevant to your interests</td>
<td>• Identity • Contact • Marketing and Communications • Profile</td>
<td>Performance of a contract with you</td>
</tr>
<tr>
<td>To provide service including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(a) Manage payments, fees and charges</td>
<td>• Identity • Contact • Financial • Transaction • Marketing and Communications</td>
<td>Performance of a contract with you</td>
</tr>
<tr>
<td>(b) Collect and recover money owed to us</td>
<td></td>
<td>Necessary for our legitimate interests (to recover debts due to us)</td>
</tr>
<tr>
<td>To process and deliver your order for any products including:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(a) Manage payments, fees and charges</td>
<td>• Identity • Contact • Financial • Transaction • Marketing and Communications</td>
<td>Performance of a contract with you</td>
</tr>
<tr>
<td>(b) Collect and recover money owed to us</td>
<td></td>
<td>Necessary for our legitimate interests (to recover debts due to us)</td>
</tr>
<tr>
<td>To manage our relationship with you which will include:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(a) Notifying you about changes to our terms or privacy policy</td>
<td>• Identity • Contact • Profile • Marketing and Communications</td>
<td>Performance of a contract with you</td>
</tr>
<tr>
<td>(b) Asking you to leave a review or take a survey</td>
<td></td>
<td>Necessary to comply with legal obligation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</td>
</tr>
<tr>
<td>To enable you to partake in a prize draw, competition or complete a survey</td>
<td>• Identity • Contact • Profile • Usage</td>
<td>Performance of a contract with you</td>
</tr>
<tr>
<td></td>
<td></td>
<td>(Necessary for our legitimate interests (to study how customers use our)</td>
</tr>
<tr>
<td>Purpose</td>
<td>Data Categories</td>
<td>Legal Basis</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>---------------------------------------</td>
<td>----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>To administer and protect our business and this website (including</td>
<td>• Identity • Contact • Technical</td>
<td>Necessary for our legitimate interests (for running our business, provision of</td>
</tr>
<tr>
<td>troubleshooting, data analysis, testing, system maintenance, support,</td>
<td></td>
<td>administration and IT services, network security, to prevent fraud and in the</td>
</tr>
<tr>
<td>reporting and hosting of data)</td>
<td></td>
<td>context of a business reorganisation or group restructuring exercise)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Necessary to comply with a legal obligation</td>
</tr>
<tr>
<td>To deliver relevant website content and advertisements to you and</td>
<td>• Identity • Contact • Profile •</td>
<td>Performance of a contract with you</td>
</tr>
<tr>
<td>measure or understand the effectiveness of the advertising we serve to</td>
<td>Usage • Marketing and Communications</td>
<td></td>
</tr>
<tr>
<td>you</td>
<td>• Technical</td>
<td></td>
</tr>
<tr>
<td>To promote membership, engagement and networking opportunities, be it</td>
<td>• Identity • Contact • Marketing and</td>
<td>Performance of a contract with you</td>
</tr>
<tr>
<td>at an event or through digital mediums</td>
<td>Communications • Profile</td>
<td></td>
</tr>
<tr>
<td>To connect you with other communities within specialty coffee, such</td>
<td>• Identity • Contact • Marketing and</td>
<td>Performance of a contract with you</td>
</tr>
<tr>
<td>as a local National Chapter or relevant guild</td>
<td>Communications • Profile</td>
<td></td>
</tr>
<tr>
<td>To send you our latest research and thought leadership content; provide</td>
<td>• Identity • Contact • Marketing and</td>
<td>Performance of a contract with you</td>
</tr>
<tr>
<td>you with invitations to relevant events and reminders or joining</td>
<td>Communications • Profile</td>
<td></td>
</tr>
<tr>
<td>details for those events to which you register</td>
<td></td>
<td></td>
</tr>
<tr>
<td>To enable us to enhance, modify, personalise or otherwise improve our</td>
<td>• Identity • Contact • Technical •</td>
<td>Necessary for our legitimate interests (to define types of customers for our</td>
</tr>
<tr>
<td>services/communications for the benefit of our customers</td>
<td>Profile • Usage</td>
<td>products and services, to keep our website updated and relevant, to develop our</td>
</tr>
<tr>
<td></td>
<td></td>
<td>business and</td>
</tr>
</tbody>
</table>
Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message or marketing from us.

**MARKETING COMMUNICATIONS**

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to third party marketing at any time by updating your preferences with us. To do this follow the “Update your preferences” link at the bottom of any SCA email.

We offer regular emails to let you know about our products and services and to inform you of the latest SCA activities, such as events, education, research and insights. We may also invite you to take part in surveys about our products and services or issues affecting SCA.

SCA may personalise the message content based on any information you provide to us and your use of our platforms.

You can update your communications preferences and stop receiving any future emails at any time by following the convenient links located at the bottom of our emails. Requests submitted in this manner are processed and effective immediately.

If you believe you have received unwanted, unsolicited emails sent by or purporting to be from SCA, please forward a copy of that email with your comments to dataprotection@sca.coffee.

Occasionally, we may contract a third party to communicate on our behalf to the third-party’s contacts. We don’t collect your email address or contact information from this third party, and we don’t have access to their mailing list.
Depending on the nature of the third-party mailing, we may, in order to comply with applicable laws, provide the third party with a suppression list of contacts to exclude from their list. The third party doesn’t have permission to keep or market to contacts this list, or to use it in any way other than as a suppression list for a mailing they’re providing on our behalf.

Please note that if you are a member or have signed up to an SCA programme then opting out of our marketing and communications emails will result in you not receiving emails about your membership or programme.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Policy.

Change of purpose

We will only use your personal data for the purposes 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at dataprotection@sca.coffee.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

HOW LONG WILL WE RETAIN YOUR PERSONAL DATA?

We will hold your personal information on our systems for as long as you remain engaged with the relevant activity, or as long as is set out in any relevant contract you hold with SCA.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you’ve indicated an interest in taking part in one of our programmes, we’ll retain your data for a period of three years from the point that you last engage with us.

WILL WE DISCLOSE YOUR PERSONAL DATA?

Internal Parties

We may share your personal data with our branch offices and subsidiaries in order to deliver upon performance of a contract with you, or for purpose or activities related to the above section Purpose for which we will use your Personal Data.
Apart from meeting the needs of your request, such as connecting you with your local National Chapter (where one exists in your country), we’ll never share or sell your data to third parties to use for their own purposes unless we’re required to do so by law. For example, we may do this when receiving a court order or for the purposes of prevention of fraud or other crime.

Your information may be shared with our educational partners where necessary to provide you with a service you’ve requested.

**External Parties**

SCA sometimes uses third parties to process your information on our behalf, for example to provide services (e.g. 25 magazine subscription, event registrations, membership fulfilment etc.) or analysis. We require these third parties to comply strictly with your instructions and that they don’t use your personal information for their own business purposes, unless you have explicitly consented to them using your personal information in this way.

We may use information which we hold about you to show you relevant advertising on third-party sites (e.g. Facebook, Google, Instagram, and Twitter). If you don’t want to be shown targeted advertising messages from SCA, some third-party sites allow you to request that you don’t see messages from specific advertisers on that site in future. For more information on this, please review the relevant advertiser’s privacy policy on their own web page or app.

We may share your personal data with 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 data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**INTERNATIONAL TRANSFERS**

Although most of the information we store and process stays within the European Economic Area GDPR compliant third-party platforms, some information may be transferred to countries outside the European Economic Area (EEA).

We may share your personal data within the SCA Group. This will involve transferring your data outside the European Economic Area (EEA).

Many of our external third parties (such as Google, Wufoo, Typeform and Shopify) are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
• Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
• Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us at dataprotection@sca.coffee if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

DATA ACCESS, UPDATES AND REMOVAL

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You may request in writing that SCA disclose details of data which it holds about you and the purpose for which such data is held. We’ll need your passport or driver’s licence for proof of identity. We’ll use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files.

You may have the right to update or amend the information we hold about you if it is incorrect. Under certain circumstances you may have the right to ask us to remove your personal information from our records.

To request access, updates or removal of your data please contact dataprotection@sca.coffee

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to make a complaint to the Information Commissioner’s Office (ICO). The ICO can be contacted by:

Wycliffe House
Water Lane
Wilmslow
Cheshire, SK9 5AF
United Kingdom
Tel: +44 (0)303 123 1113 (local rate)
Web: ico.org.uk

COOKIE POLICY

WHAT ARE COOKIES AND HOW DOES SCA USE THEM?

What is a Cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to your
computer, tablet or mobile phone (all referred to here as a "device") web browser from a website's computer and is stored on your device's hard drive.

Each website can send its own cookie to your web browser if your browser's preferences allow it. Many websites do this whenever a user visits their website in order to track online traffic flows. Similar technologies are also often used within emails to understand whether the email has been read or if any links have been clicked. If you continue without changing your settings, we’ll assume you’re happy to receive all cookies on the SCA website.

On SCA Website, cookies record information about your online preferences and allow us to tailor our website to your interests.

During the course of any visit to a SCA Website, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

**How does SCA use cookies?**

Information supplied by cookies can help us to understand the profile of our visitors and help us to provide you with a better user experience. It also helps us recognise when you’re signed in to your SCA account and to provide a more personalised experience. For example, if on a previous visit you went to our faculty research pages, we might find this out from your cookie and highlight faculty research information on your second and subsequent visits. SCA uses this type of information to help improve the services it provides to its users.

**Third-party cookies in embedded content on SCA pages**

Please note that during your visits to SCA websites, you may notice some cookies that aren’t related to SCA.

We sometimes embed content from social media and other third-party websites. These may include YouTube, Twitter, Facebook and SoundCloud. As a result, when you visit a page containing such content, you may be presented with cookies from these websites and these third-party cookies may track your use of the SCA website. SCA doesn’t control the dissemination of these cookies and you should check the relevant third party’s website for more information. If you continue without changing your settings, we'll assume you’re happy to receive all cookies on the SCA website.

Where SCA embeds content from social media and other third-party websites, some websites may use Google Analytics to collect data about user behaviour for their own purposes. SCA doesn’t control this. For more information, see the Google webpage "How Google uses data when you use our partners’ sites or apps”

**SCA cookies**

It’s important to note that if you change your settings and block certain cookies, you won’t be able to take full advantage of some of our services’ features – and we might not be able to provide some features you have previously chosen to receive.

**Other information collected from web browsers**
Your web browser may also provide SCA with information about your device, such as an IP address and details about the browser you’re using. We use information provided by your browser or by the link that you’ve clicked to understand the webpage that directed you to SCA and this may be captured by performance cookies.

If you have any concerns about the way that we use cookies or respect your settings, then please email dataprotection@sca.coffee

**APPS AND DEVICES**

When you download or use SCA apps on your mobile device, information may be accessed from or stored on your device. Most often this is used in a similar way to a web browser cookie, by enabling the app to ‘remember’ you or provide you with the content you have requested.

Your web browser or device may also provide SCA with information about your device, such as a device identifier or IP address. Device identifiers may be collected automatically, such as the device ID, IP address, MAC address, IMEI number and app ID (a unique identifier relating to the particular copy of the app you’re running).

When signing in to a SCA app, your sign-in details may be stored securely on the device you’re using, so you can access other SCA apps on the same device without needing to enter your sign-in details again.

If you have any concerns about any information that might be accessed from or stored on your device by SCA, you may wish to only access SCA content through a web browser and review your web browser settings.

**DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

**OFFENSIVE AND INAPPROPRIATE CONTENT**

If you post or send content which may reasonably be deemed to be offensive, inappropriate or objectionable anywhere on or to SCA Website or social media channels, or otherwise engage in any disruptive behaviour on any SCA service, we may remove such content.

Where SCA reasonably believes that you are in breach of any applicable laws, we may disclose your personal information to relevant third parties, including law enforcement agencies or your internet provider. SCA would only do so in circumstances where such disclosure is permitted under applicable laws, including data protection law.
CONTACTING US ABOUT THIS PRIVACY POLICY

If you have any questions or comments about this Privacy Policy, please contact: dataprotection@sca.coffee