

# Privacy Policy

**Last updated:** 27<sup>th</sup> March, 2026

## 1. About this Privacy Policy

This Privacy Policy explains how Bubble City Ltd, trading as Bubble CiTea (“Bubble CiTea”, “we”, “us” or “our”), collects, uses, stores and shares personal data when you:

- visit our website;
- place an order through our online shop;
- use our mobile app;
- join or use our loyalty, rewards or membership programme;
- contact our customer service team;
- enter competitions, giveaways or promotions;
- interact with us on social media; or
- otherwise engage with Bubble CiTea.

This Privacy Policy applies to our website, mobile app, loyalty and rewards services, customer services, marketing activities, competitions and promotions, unless we tell you otherwise.

In this Privacy Policy, personal data means information that identifies you, or which can reasonably be used to identify you.

## 2. Who We Are

**Bubble City Ltd**

**Company number: 08655296**

**Registered office: 5 Interchange Park, Robinson Way, Portsmouth, England, PO3 5QD**

Bubble City Ltd is the controller of your personal data for the purposes described in this Privacy Policy and trades under the Bubble CiTea brand.

For the purposes of UK data protection law, the “controller” is the organisation that decides how and why your personal data is used.

If you have any questions about this Privacy Policy or wish to exercise your rights, you can contact us at:

**Email:** [customerservice@bubblecitea.com](mailto:customerservice@bubblecitea.com)

**Post:** Privacy Team, Bubble CiTea, 5 Interchange Park, Robinson Way, Portsmouth, England, PO3 5QD

### **3. Stores, Franchisees and Participating Locations**

Bubble CiTea operates through a network of stores, and some locations may be operated by franchisees, affiliates or other store operators.

Where a local store collects and uses your personal data for its own in-store sales, refunds, local customer service, accounting, tax, employment or legal compliance purposes, that local operator may also act as a separate controller of your personal data for those purposes.

Unless we tell you otherwise, this Privacy Policy covers the website, app, central loyalty and rewards activities, and central marketing and customer service activities operated under the Bubble CiTea brand.

### **4. The Personal Data We Collect**

The personal data we collect depends on how you interact with us.

#### **4.1 Information you give us directly**

You may give us information such as:

- your name;
- email address;
- mobile or telephone number;
- billing address;
- delivery address;
- account, membership or login details;
- date of birth or birthday information, where you choose to provide this for birthday rewards or similar offers;
- customer service enquiries, complaints, feedback and correspondence;
- images, social media usernames, handles or content you submit to us;
- competition, giveaway or promotion entry information;
- any information you provide when filling in forms on our website, app, social media pages or promotional pages.

## 4.2 Order, payment and transaction information

When you buy from us online, in-app or in-store, or use our loyalty programme, we may collect:

- order and purchase details;
- items purchased;
- transaction date and time;
- transaction amount;
- store visited;
- refund, cancellation or overcharge records;
- loyalty or membership activity, including points, stamps, rewards, vouchers and redemption records;
- referral activity and referral code use;
- gift card or promotional voucher usage records.

Payment card details are generally processed securely by our payment and commerce providers, including **Shopify** and **Square**. Our intention is not to store full card numbers or card security codes on our own systems unless this becomes strictly necessary, lawful and appropriately secured.

## 4.3 Loyalty and customer behaviour information

Where you use our membership, rewards or app services, we may collect and analyse information such as:

- the Bubble CiTea locations you visit;
- how often you purchase from us;
- your average spend;
- your rewards activity;
- the offers you use;
- the store most frequently associated with your purchases; and
- broad patterns in how customers engage with our products, stores and promotions.

This helps us operate the loyalty programme, understand customer trends, improve our services and, where permitted, tailor relevant promotions.

#### **4.4 Website, app and device information**

When you use our website or app, we may automatically collect technical information such as:

- IP address;
- browser type and version;
- device type;
- operating system;
- app version;
- time zone;
- log data;
- crash or diagnostic data;
- cookie identifiers and similar technology data;
- pages, screens or products viewed;
- referring websites or links; and
- information about how you interact with the website or app.

#### **4.5 Marketing and communications preferences**

We may collect information about:

- whether you have agreed to receive marketing by email, SMS, push notification or other channels;
- your contact preferences;
- whether you open marketing messages or use offers, where this is measured lawfully; and
- your unsubscribe or opt-out choices.

#### **4.6 Social media and promotional information**

If you interact with us through Instagram or other social media platforms, or enter a giveaway, competition or promotion, we may collect:

- your social media username or handle;
- images, comments, messages or content you submit;

- your email address, postal address or phone number, where needed to administer the promotion;
- records of winners, prize fulfilment and communications; and
- publicly available profile information you choose to make visible to us through that platform.

#### **4.7 Information from third parties**

We may receive personal data about you from third parties, including:

- **Shopify**, where you place orders through our online shop;
- **Square**, where you enrol in or use our payment, customer, loyalty or rewards services;
- social media platforms such as Instagram, where you interact with our pages, messages, posts, competitions or promotions;
- payment providers, delivery partners and service providers involved in fulfilling your order or providing our services; and
- Bubble CiTea group companies, affiliates, franchisees or participating stores, where relevant and lawful.

#### **5. How We Collect Your Personal Data**

We collect personal data:

- directly from you, when you order, register, contact us, enter a promotion, sign up for membership, provide your phone number at the till, or otherwise interact with us;
- automatically, when you browse our website or use our app;
- through technologies such as cookies, pixels, tags, SDKs and similar tools;
- from third-party service providers and platforms that help us run our business; and
- from publicly accessible sources, including publicly visible social media activity where relevant to your interaction with us.

#### **6. How We Use Your Personal Data and Our Lawful Bases**

Under UK data protection law, we must have a lawful basis for using your personal data. Depending on the circumstances, we rely on one or more of the following:

- performance of a contract;
- compliance with a legal obligation;

- our legitimate interests; and
- your consent.

### **6.1 To process orders and provide products or services**

We use your personal data to:

- process payments;
- fulfil and deliver orders;
- provide receipts, confirmations and service messages;
- administer refunds and exchanges; and
- operate your account, app profile or rewards membership.

**Lawful basis:** performance of a contract with you.

### **6.2 To operate the Bubble CiTea app, membership and rewards programme**

We use your personal data to:

- register and manage your membership;
- track stamps, points, vouchers and redemptions;
- verify your eligibility for promotions or rewards;
- administer referral schemes and birthday offers; and
- make rewards and offers available in the app or online portal.

**Lawful basis:** performance of a contract with you, and in some cases our legitimate interests in operating and improving the programme.

### **6.3 To provide customer service and handle complaints**

We use your personal data to:

- answer questions;
- deal with complaints;
- investigate issues with transactions or orders;
- respond to feedback; and
- keep records of customer service matters.

**Lawful basis:** performance of a contract, compliance with legal obligations, and our legitimate interests in running our business and resolving issues.

#### **6.4 To detect fraud, protect security and prevent misuse**

We may use personal data to:

- check transactions;
- identify suspicious activity;
- protect our website, app, customers, staff and business; and
- investigate misuse of offers, vouchers, rewards or promotions.

**Lawful basis:** our legitimate interests in protecting our business and customers, and compliance with legal obligations where applicable.

#### **6.5 To analyse customer behaviour and improve our services**

We may use data from Shopify, Square, the app, website analytics and store activity to understand:

- which stores customers visit;
- how frequently customers purchase;
- average spend levels;
- uptake of offers and rewards; and
- customer trends across stores, products and channels.

We use this information to improve our products, service levels, customer experience, app features, promotions and business planning.

**Lawful basis:** our legitimate interests in understanding and improving our business, and consent where required for non-essential cookies, similar technologies or app-based tracking.

#### **6.6 To send marketing and promotions**

We may use your contact details to send you updates, offers, vouchers, news and promotions by email, SMS, push notification or other electronic means.

We will only do this where permitted by law, including where:

- you have given us your consent; or

- we are allowed to rely on the “soft opt-in” for existing customers in accordance with applicable electronic marketing rules.

You can opt out at any time by using the unsubscribe link in our messages, updating your preferences in the app or contacting us.

**Lawful basis:** consent, or where permitted, our legitimate interests in promoting our business together with compliance with electronic marketing rules. We also keep suppression records so that we can respect opt-outs.

### **6.7 To administer competitions, giveaways and promotions**

We use personal data to:

- record entries;
- verify eligibility;
- contact winners;
- send prizes;
- prevent abuse of promotions; and
- publish winner information where permitted by law or promotion terms.

If we wish to use your image, testimonial or user-generated content for wider marketing beyond administering the promotion, we will seek permission where required.

**Lawful basis:** performance of a contract with entrants, our legitimate interests in promoting our brand fairly, and consent where required.

### **6.8 To comply with law and protect legal rights**

We may use and retain personal data where necessary to:

- comply with tax, accounting and regulatory requirements;
- respond to lawful requests from regulators, courts or law enforcement; and
- establish, exercise or defend legal claims.

**Lawful basis:** compliance with legal obligations and our legitimate interests in protecting our legal position.

### **6.9 Corporate activity**

If we reorganise, sell part of the business, merge or undertake investment activity, we may need to share personal data with advisers or counterparties under appropriate confidentiality measures.

**Lawful basis:** our legitimate interests in running, restructuring or growing our business.

## 7. Profiling and Automated Decision-Making

We may use limited profiling or audience segmentation, for example by looking at store visits, purchase frequency, loyalty activity or average spend in order to understand customer trends and make promotions more relevant.

However, we do not currently make decisions about you based solely on automated processing that produce legal effects or similarly significant effects on you.

## 8. Marketing Preferences

You can opt out of direct marketing at any time by:

- clicking the unsubscribe link in an email;
- following the opt-out instructions in an SMS;
- changing your app settings, where available; or
- contacting us using the details in this Privacy Policy.

Even if you opt out of marketing, we may still send you non-marketing messages where necessary, such as service messages about your account, order, rewards, security or legal matters.

## 9. Cookies and Similar Technologies

Our website and, where relevant, our app use cookies and similar technologies to operate, secure and improve our services.

These technologies may be used for:

- essential website and app functionality;
- remembering preferences;
- security and fraud prevention;
- analytics and performance measurement;
- measuring the success of campaigns; and
- personalising content or offers, where lawful.

Where cookies or similar technologies are not strictly necessary, we will ask for your consent before using them. You can manage your preferences through our cookie banner, cookie settings tools or device settings, as applicable.

If we publish a separate Cookie Policy, that policy should be read alongside this Privacy Policy.

## 10. Mobile App, Permissions and In-App Notices

The Bubble CiTea app may be used to support your membership, rewards, vouchers, QR code scanning, offers, purchase history and communications with us.

The app may also collect limited technical and diagnostic information needed to operate, secure and improve the app.

If the app requests access to device features or personal data that are not obvious from the feature you are using — for example notifications, camera/photos or device location — we will explain why at the point of request and, where required, ask for your permission before access.

You can usually manage device permissions through your phone's settings.

## 11. Who We Share Your Personal Data With

We may share your personal data with the following categories of recipients where necessary:

- **Shopify** and associated e-commerce service providers, to operate our online shop;
- **Square** and associated payment, loyalty, customer and rewards service providers;
- payment processors, payment gateways, banks and fraud prevention providers;
- couriers, delivery providers and logistics partners;
- website hosting, cloud hosting, IT support and software providers;
- analytics, communications and marketing service providers;
- customer support providers;
- social media platforms where you interact with us through those platforms;
- professional advisers such as lawyers, accountants, auditors and insurers;
- regulators, law enforcement bodies, courts and government authorities where required;
- franchisees, participating Bubble CiTea stores, affiliates or group companies where relevant to your purchase, reward, complaint or service request; and
- a prospective buyer, investor or transaction counterparty, and their advisers, in connection with a corporate transaction.

We require service providers processing personal data on our behalf to do so only on our instructions and with appropriate security and confidentiality protections.

We do not sell your personal data for money.

## **12. International Transfers**

Some of our service providers may process personal data outside the UK.

Where we transfer personal data internationally, we will take steps to ensure that it remains protected in accordance with UK data protection law. This may include relying on:

- an adequacy decision or adequacy regulations; or
- approved contractual safeguards and supplementary measures where required.

You may contact us if you would like more information about the safeguards used for international transfers.

## **13. Data Security**

We use appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or unauthorised access.

These measures may include access controls, role-based permissions, password protections, encryption in transit, secure service providers and internal procedures for handling data securely.

However, no method of transmission over the internet or electronic storage is completely secure, so we cannot guarantee absolute security.

## **14. How Long We Keep Your Personal Data**

We keep personal data only for as long as reasonably necessary for the purposes set out in this Privacy Policy, including to meet legal, accounting, tax, regulatory, fraud prevention and dispute resolution requirements.

In general:

- **Online order, payment, invoice and tax records** are usually kept for up to **6 years** after the relevant financial year or transaction, or longer where the law requires.
- **App account, membership and loyalty records** are usually kept for as long as your account remains active and for a reasonable period afterwards, typically up to **24 months after inactivity or closure**, unless a longer period is needed for legal claims, fraud prevention, accounting or regulatory reasons.

- **Refund and dispute records** may be kept for up to **6 years** where needed to resolve claims or comply with legal obligations.
- **Customer service, feedback and complaint records** are usually kept for up to **3 years** after the issue is closed, unless longer retention is needed.
- **Competition and giveaway records** are usually kept for up to **12 months** after the promotion ends, unless longer retention is necessary for winner verification, legal claims or regulatory reasons.
- **Marketing preferences and consent records** are kept until you opt out or withdraw consent, and we may retain suppression information afterwards so that we can continue to respect your wishes.
- **Analytics, cookie and technical usage data** are kept in line with our cookie settings, app settings and service provider retention periods.

Where possible, we may anonymise data so that it no longer identifies you. We may use anonymised information for analysis, planning and reporting without time limit.

## 15. Your Rights

Under UK data protection law, you may have the right to:

- request access to the personal data we hold about you;
- request correction of inaccurate or incomplete data;
- request deletion of your personal data in certain circumstances;
- request restriction of processing in certain circumstances;
- object to processing based on legitimate interests;
- object at any time to the use of your personal data for direct marketing;
- request transfer of certain personal data to you or another provider; and
- withdraw consent at any time where we rely on consent.

These rights are not absolute and may be subject to legal exemptions or conditions.

To exercise your rights, please contact us using the details in section 2. We may need to verify your identity before acting on your request.

## 16. Your Right to Complain

If you are unhappy with how we use your personal data, please contact us first and we will try to resolve the issue.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection matters.

### **17. If You Do Not Provide Personal Data**

Where we need personal data to provide a product, service, account, app feature, reward or promotion, and you do not provide that data, we may not be able to:

- process your order;
- deliver your products;
- create or manage your membership or rewards account;
- provide a voucher, reward or promotion;
- respond fully to your request; or
- provide certain website or app features.

### **18. Children**

Our website, app and services are not intended to be used independently by children under the age of **13** without appropriate parental or guardian involvement.

We do not knowingly collect personal data from children in a way that is unlawful. If you believe that a child has provided personal data to us inappropriately, please contact us and we will review the matter.

### **19. Third-Party Websites and Social Media Platforms**

Our website, app or communications may include links to third-party websites, services or platforms.

If you follow those links or interact with third-party services, your personal data will be handled under their own privacy policies and terms. We are not responsible for the privacy practices of third-party services that we do not control.

### **20. Changes to This Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our services, technology, legal requirements or business practices.

When we make material changes, we will take reasonable steps to bring them to your attention, for example by updating the date above, posting a notice on our website or app, or contacting you where appropriate.

### **21. Contact Us**

**Bubble City Ltd trading as Bubble CiTea**

Privacy Team  
5 Interchange Park  
Robinson Way  
Portsmouth  
England  
PO3 5QD  
United Kingdom

**Email:** [customerservice@bubblecitea.com](mailto:customerservice@bubblecitea.com)