

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR). We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to goods and services we offer to individuals and our wider operations in the European Economic Area (EEA).

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Kawai UK Limited Company Registration Number 02007319 Registered office – Unit 8 Dunfermline Court, Maidstone Road, Milton Keynes, MK10 0BY
Personal data	Any information relating to an identified or identifiable individual
Data subject	The individual who the personal data relates to

Personal data we collect about you

We will collect and use the following personal data about you:

- your name and contact information, including email address and telephone number
- your billing information, transaction and payment card information

We collect and use this personal data for the purposes described in the section ‘**How and why we use your personal data**’ below. If you do not provide personal data we ask for, it may delay or prevent us from providing products and services to you.

How your personal data is collected

We collect most of this personal data via directly from you—in person, by telephone, text or email and/or via our website or a third party website where you are purchasing our products. However, we may also collect information directly from our agent(s) or dealer(s) acting on our behalf.

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, eg:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract; or
- for our legitimate interests or those of a third party.

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing products and services to you	To perform our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interest, ie to minimise fraud that could be damaging for you and/or us
To enforce legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, ie to protect our business, interests and rights
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, eg policies covering security and internet use	For our legitimate interests, ie to make sure we are following our own internal procedures
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Ensuring the confidentiality of commercially sensitive information	Depending on the circumstances: —for our legitimate interests, ie to protect trade secrets and other commercially valuable information; —to comply with our legal and regulatory obligations

What we use your personal data for	Our reasons
Statistical analysis to help us manage our business, eg in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Preventing unauthorised access and modifications to systems	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —for our legitimate interests, ie to prevent and detect criminal activity that could be damaging for you and/or us; —to comply with our legal and regulatory obligations
Protecting the security of systems and data used to provide the goods and services	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>
Updating customer records	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to perform our contract with you or to take steps at your request before entering into a contract; —to comply with our legal and regulatory obligations; —for our legitimate interests, eg making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to comply with our legal and regulatory obligations; —for our legitimate interests, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
External audits and quality checks, eg for ISO or Investors in People accreditation and the audit of our accounts to the extent not covered by	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —for our legitimate interests, ie to maintain our

What we use your personal data for	Our reasons
'activities necessary to comply with legal and regulatory obligations' above	accreditations so we can demonstrate we operate at the highest standards; —to comply with our legal and regulatory obligations
To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency In such cases information will be anonymised where possible and only shared where necessary	Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, ie to protect, realise or grow the value in our business and assets

How and why we use your personal data—sharing

See **'Who we share your personal data with'** for further information on the steps we will take to protect your personal data where we need to share it with others.

Who we share your personal data with

We routinely share personal data with:

- companies within the Kawai group;
- Jotform;
- third parties we use to help deliver our products and services to you, eg payment service providers, warehouses and delivery companies;
- third party engineers, technicians and tuners;
- other third parties we use to help us run our business, eg marketing agencies or website hosts; and
- our banks.

We or the third parties mentioned above occasionally also share personal data with:

- our and their external auditors, eg in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations;

- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- engineers, tuners, and technicians who provide services under applicable product warranties;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

Who we share your personal data with—further information

If you would like more information about who we share our data with and why, please contact us (see ‘**How to contact us**’ below).

Where your personal data is held

Personal data may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: ‘**Who we share your personal data with**’).

Some of these third parties may be based outside the UK/EEA. For more information, including on how we safeguard your personal data when this happens, see below: ‘**Transferring your personal data out of the UK and EEA**’.

How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used. For example, the duration of our ten year warranty period for Acoustic Pianos.

If you no longer have an account with us or we are no longer providing goods or services to you, we will usually delete or anonymise your account data after ten years.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

Transferring your personal data out of the UK and EEA

It is sometimes necessary for us to transfer your personal data to countries outside the UK and EEA. In those cases we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

We will transfer your personal data to:

- our group companies located outside the UK in Germany and Japan; and
- our service providers located outside the UK in Germany and Japan.

We will also transfer your personal data from the EEA to the UK.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA where:

- the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an ‘**adequacy regulation**’) further to Article 45 of the UK GDPR. A list of countries the UK currently has adequacy regulations in relation to is available [here](#). We rely on adequacy regulations for transfers to the following countries: Germany, Japan, Australia and the USA.
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you; or
- a specific exception applies under relevant data protection law.

Where we transfer your personal data outside the UK or EEA, we do so on the basis of an adequacy regulation or (where this is not available) legally approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR and/or EU GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your personal data outside the UK/EEA unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on ‘**Changes to this privacy policy**’ below.

Transferring your personal data out of the UK and EEA—further information

If you would like further information about data transferred outside the UK/EEA, please contact us (see ‘**How to contact us**’ below).

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, eg if you contest the accuracy of the data

Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consent	If you have provided us with consent to use your personal data you have a right to withdraw that consent easily at any time You may withdraw consent by contacting us – see How to contact us below Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn

For more information on each of those rights, including the circumstances in which they apply, please contact us (see ‘**How to contact us**’ below) or see the [Guidance from the UK Information Commissioner's Office \(ICO\)](#).

If you would like to exercise any of those rights, please:

- email or write to us—see below: ‘**How to contact us**’; and
- provide enough information to identify yourself (*eg your full name, address, invoice number and product/serial number (if relevant)*) and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being lost accidentally, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

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

How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below '**How to contact us**').

You may also have the right to lodge a complaint with the Information Commissioner (the UK data protection regulator) and/or the relevant supervisory authority in your jurisdiction. Please contact us if you would like further information.

Changes to this privacy policy

This privacy notice was published in January 2025.

We may change this privacy notice from time to time—when we do, we will inform you via an update on our website.

Updating your personal data

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed, eg your surname or address—see below '**How to contact us**'.

How to contact us

Individuals in the UK

You can contact us by post or email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
Data Protection, Kawai UK Ltd. Unit 8, Dunfermline Court, Maidstone Road Kingston, Milton Keynes, MK10 0BY dataprotection@kawai.co.uk

Individuals in the EEA

Individuals within the EEA can contact us direct (see above) or contact Kawai Europa GmbH by post:
Europark, Fichtenhain A 15, D-47807 Krefeld.