

Privacy Policy

Effective: as of March 03, 2021

This privacy policy contains the definition adopted by:

ShareSpace sp. z o.o. with its registered office in Warsaw (00-680) at Poznańska 17/13, entered in the National Court Register under the number KRS 0000760079, having the following identification numbers: NIP 7010893925 and REGON 381900949 rules for the processing of personal data collected from users of the www.ShareSpace.work website (hereinafter: "Service" and "Users").

This Privacy Policy is an expression of concern for the rights of persons visiting the Website located at the company's domains and using the services offered through it.

It is also the fulfillment of information obligations arising from:

Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Official Journal of the EU L119 of 4.05.2016, p. 1) (hereinafter RODO).

and

Article 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data regardless of their nationality or place of residence (General Data Protection Regulation) (Official Journal of the EU L119 of 4.05.2016, p. 1) (hereinafter RODO).

1. Personal data

Personal data – in accordance with the disposition of art. 4 item. 1 RODO means information about an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person.

2. Personal Data Administrator

The administrator of personal data of the Site Users is:

ShareSpace sp. z o.o. with its registered office in Warsaw (00-680) at Poznańska 17/13, registered in the National Court Register under the number KRS 0000760079, NIP 7010893925, REGON 381900949.

E-mail: gdpr@sharespace.work

The person responsible for personal data protection is: Marcin Dyszyński, e-mail: gdpr@sharespace.work

3. Basis, purpose and scope of processing

The Data Controller declares that it processes Users' personal data on the basis of:

(Article 6(1)(b) of the RODO) – i.e. the processing is necessary for the performance of a contract to which the data subject is a party or to take steps at the request of the data subject prior to entering into a contract; and (Article 6(1)(a) of the a RODO), i.e. the legitimate interests of the Controller consisting in the defense of the rights of the Controller, including the assertion of claims, ensuring proper customer service and in order to improve the services provided by the Controller and the functioning of its website, as well as to ensure its security; or (Article 6(1)(a) RODO), i.e. on the basis of the data subject's consent in the case of the use of personal data for marketing purposes.

The controller processes personal data in order to fulfil the contract

or purpose indicated in the consent form. The Administrator processes the data only to the extent necessary for these purposes and for the period necessary to fulfill the agreement or until the Service user withdraws the consent.

The Administrator's Service located at ShareSpace.work collects the following personal data of the Service's Users:

- a. First Name
- b. Surname;
- c. E-mail address;
- d. Phone number;
- e. User's company name;
- f. Password;
- g. Data pertaining to the leased space;
- h. Payment data;
- i. Rental contract data
- j. Correspondence

Personal data of the Service Users will not be transferred outside the European Economic Area, with the exception of Great Britain, to which personal data may be transferred under the terms of data transfer to the countries of the European Economic Area until 1 July 2021 at the latest, in accordance with the provisions of the Agreement on Trade and Cooperation between the European Union and the European Atomic Energy Community and the United Kingdom of Great Britain and Northern Ireland.

After that date, or sooner (if conditions arise under the above-mentioned agreement, e.g. if the European Commission issues an adequacy decision in respect of the United Kingdom), transfers will be carried out either without specific safeguards (if an adequacy decision is issued) or with adequate and appropriate safeguards in accordance with the RODO, which we will inform you about in an updated Privacy Policy.

Service User personal data can be made available to third parties, including operators of leased spaces and entities entering into

agreements to lease space, and if it results from applicable laws obliging the Administrator to transfer personal data to authorized entities.

The Administrator collects service logs, however he does not associate them in any way with personal data. On the basis of log files, statistics may be generated to assist in the administration. Collective summaries in the form of such statistics do not contain any identifying characteristics of persons visiting the Service.

4. Users' Rights.

In accordance with Articles 15 - 22 of the RODO, each user has the following rights:

Right of access (Article 15 RODO).

The data subject is entitled to obtain confirmation from the Controller as to whether personal data concerning him or her are being processed, and if this is the case, he or she is entitled to obtain access to the data. In accordance with Article 15, the Controller will provide the data subject with a copy of the personal data being processed.

Right to rectification (Article 16 of the RODO)

The data subject shall have the right to request the Controller to rectify without delay personal data concerning him/her which are inaccurate or to complete incomplete personal data having regard to the purposes of the processing.

Right to erasure ("right to be forgotten") (Article 17 RODO)

The data subject has the right to request from the Controller the immediate erasure of personal data concerning him/her, and the Controller is obliged to erase the personal data without undue delay if one of the following circumstances applies:

- a. the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b. the data subject has withdrawn the consent on which the processing is based and there is no other legal basis for the processing;

- c. the data subject objects under Article 21(1) or (2) of the RODO to the processing and there are no overriding legitimate grounds for the processing;
- d. the personal data have been unlawfully processed;
- e. the personal data must be erased in order to comply with a legal obligation under Union or Polish law.

Right to restriction of processing (Article 18 RODO)

The data subject has the right to request the controller to restrict processing in the following cases:

- a. When the data subject challenges the accuracy of the data- for a period of time allowing the controller to verify the accuracy of the data;
- b. The data subject has raised an objection under Article 21(1) to the processing - until such time as it is established whether the legitimate grounds on the part of the controller override the grounds of the data subject's objection.
- c. The processing is unlawful and the data subject objects to the erasure of the personal data, requesting instead that the processing be restricted;
- d. The controller no longer needs the personal data for the purposes of the processing, but they are needed by the data subject for the establishment, exercise or defense of claims.

Right to data portability (Article 20 RODO)

The data subject shall have the right to receive, in a structured, commonly used and machine-readable format, the personal data concerning him or her which he or she has provided to the controller, and shall have the right to transmit such personal data to another controller without hindrance from the controller to whom the personal data have been provided, if:

- a. the processing is based on consent or on a contract; and
- b. the processing is carried out by automated means.

When exercising the right to data portability, the data subject has the right to request that the personal data be sent by the controller directly to another controller, insofar as this is technically possible.

Right to object (Article 21 of the RODO)

If personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such marketing, including profiling, to the extent that the processing is related to such direct marketing.

Procedure for the exercise of rights

You may exercise your rights by sending a request to gdpr@sharespace.work. The request, in order to be correctly identified, should be sent from the e-mail address from which the User's account was registered on the Website. This is the implementation of 12(6) RODO. The request may also be submitted by mail - by sending a registered letter containing the request to the correspondence address of the Company run by the Data Controller.

In accordance with the provisions of the law, the Administrator shall, within one month from the date of the request, provide the person who submitted the request with a response on the action taken. If the Administrator does not take such action, he/she shall inform the person submitting the request.

You have the right to lodge a complaint with the Supervisory Authority about the Administrator's actions.

5. Security

The website is equipped with security measures aimed at protecting personal data under the Administrator's control against loss, misuse and modification. The Administrator also has appropriate documentation and has implemented appropriate procedures related to personal data protection in the company.

The Administrator ensures that he protects any disclosed information in accordance with applicable regulations and security standards, and in particular:

- a. Personal data collected by the Data Controller are directly accessible in accordance with 29 RODO only by authorized employees or associates of the Data Controller and authorized persons involved in the operation of the Service who have been granted appropriate powers of attorney.
- b. The Administrator declares that while commissioning services to other entities, the Administrator requires from the partners, in accordance with the disposition of 28 RODO, to ensure appropriately high standards of protection of the entrusted personal data, to sign appropriate entrustment agreements in which the partners confirm the application of the standards and the right to control the compliance of those entities with those standards. We share user data with the following external websites:

www.mixpanel.com

www.smartlook.com

www.stripe.com

www.hubspot.com

www.albacross.com

www.digitalocean.com

www.sentry.io

www.mailchimp.com

www.mandrillapp.com

www.pusher.com

www.atlassian.com

cloud.google.com

www.storyblok.com

- c. In order to ensure adequate protection of the services it provides by electronic means, the Administrator of the Service applies a high level of security, including cryptographic protection of personal data transmission (SSL protocol).

Please note, however, that due to the public nature of the Internet, using services provided electronically may involve risks, regardless of the Administrator's due diligence.

6. Cookie Mechanism.

Some areas and functions of the Website may use cookies, i.e. text files stored on the user's computer, identifying him/her in a way necessary to enable certain operations. Detailed information about the cookies used on the Website is available in the ShareSpace Policy regarding cookies.

This Cookie Policy applies to all websites and mobile applications owned by ShareSpace Sp. z o.o. and is valid from 1st of January 2019.

By using www.sharespace.work you consent to our use of cookies in accordance with this Cookie Policy. If you do not agree to our use of cookies, you should change your browser settings accordingly or refrain from using www.sharespace.work.

What are cookies?

Cookies are small files that are saved and stored on your computer, tablet or smartphone when you visit different sites on the Internet. A cookie typically contains the name of the website it came from, the "lifespan" of the cookie (i.e. how long it has been in existence), and a randomly generated unique number used to identify the browser used to connect to the website.

What do we use cookies for?

www.sharespace.work uses cookies for various purposes:

- a. to make www.sharespace.work faster and easier to use,
- b. to better match the content available on www.sharespace.work to your expectations and interests,
- c. to collect anonymous, aggregate statistics that allow us to understand how people use our site and help us improve its functionality and content.

By using cookies in the manner described above, we never identify you personally from the information stored in the cookies.

How long is data stored in cookies?

The www.sharespace.work website may use two types of cookies – session and permanent. The former remain on your device only during use of

www.sharespace.work. Permanent cookies remain on your device as long as they have a set lifetime or until you delete them.

Type of Cookies used on www.sharespace.work and what they are being used for

a. Necessary for the operation of the sites

Essential to the proper functioning of www.sharespace.work, they allow you to navigate the site and use its elements. For example, they may remember your previous actions when you return to the site in the same session.

b. Improve performance

Gathering information about how visitors use www.sharespace.work by providing information about the areas they visit, the time they spend there, and problems they encounter, such as error messages. This allows us to improve the performance of www.sharespace.work.

c. Improve functionality

Remembering your settings and choices to provide you with better tailored content and services.

Do we use third party cookies?

Yes, by using www.sharespace.work you may receive cookies from www.sharespace.work's third party partners:

adwords.google.com

analytics.google.com

www.mixpanel.com

www.smartlook.com

www.stripe.com

www.hubspot.com

www.facebook.com

www.linkedin.com

You can find more information about these cookies on the individual third party websites.

How can I change my cookie settings or delete cookies?

Most web browsers are initially set to automatically accept cookies. However, you can change your browser setting so that cookies are blocked in whole or in part, e.g. only from third parties, or so that you receive a message each time a cookie is sent to your device. Please note, however, that if you block the cookies we use, it may prevent www.sharespace.work from functioning properly.

7. Changes in the Privacy Policy

- a. The Administrator of the Service reserves the right to change the above privacy policy at any time and any place, and at the same time undertakes to publish the new privacy policy on the website of the Service without delay and to inform all the Users about it.
- b. the Administrator reserves the right to make changes, withdraw or modify the functions or features of the Website, as well as to cease operations, transfer rights to the Website and perform any legal actions allowed by applicable law.