

SPACENT

PRIVACY POLICY

Updated on 12/4/2021

Name of the register: User register

IF YOU ARE LOCATED IN EU, THE FOLLOWING POLICY WILL APPLY:

General

This Privacy Policy describes how Spacent Oy (Ltd) (“**we**” or “**Spacent**”) processes personal data we collect from the individuals (“**User**” or “**you**”) who use the Spacent App Service and/or become Our clients or potential clients.

In this Privacy Policy, you will find information on what types of data is collected, how the data is collected, used and stored and what are your rights as a data subject. You will also find information about our cookie policy and how to contact us should you have any questions regarding this Privacy Policy.

The Spacent App is a service provided by Spacent Oy (Ltd) at no cost and it is intended to be used as a platform for flexible workspace services for companies (the “**Service**”). This privacy policy applies to all individuals whose personal data is processed in relation to the Service provided by Spacent.

Spacent processes the personal data of those using our Service in accordance with the EU General Data Protection Regulation (2016/679), (“**GDPR**”) and other applicable laws and decrees. *Personal data* means any information that directly or indirectly allows a person to be identified.

Contact Information

Controller

Name: Spacent Oy (Ltd)

Address: Yliopistonkatu 4, 00100 Helsinki, Finland

Contact information: hello@spacent.com

What Are the Legal bases and Purposes of the Processing of Personal Data?

We process personal data only when there are legal bases for the processing, and we only process data that is relevant for the purposes it was collected or obtained for. The legal bases for the processing of your personal data are *agreement between us for providing the Service, our legitimate interests* (for e.g. customer relationship management and the delivery of our service) and *your consent*.

We process personal data for the purposes of the delivery and development of our Service, processing your order and managing your account, marketing (including direct and/or targeted marketing, profiling for marketing purposes), managing the customer relationship, generating statistics and analyzing the usage of our Service. We track the usage of our Service to develop the Service and offer you a better user experience. We generate statistics regarding usage in the case of an error in the Service. We also generate statistics regarding organizational level usage for an organization that offers Spacent service for their employees in order to analyze and optimize the use of Service.

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What Data Do We Process?

We process the following personal data of our customers using the Service:

- **User Information** such as name of the company and company's contact person, telephone number, email address and information relating to the payment instrument and invoicing.
- **Log Information** such as the IP address of your device, name and identification number of your device, operating system version, the configuration of the App when utilizing our Service, the time and date of your use of the Service, cookies and other statistics.
- **Information of the customer relationship and account** such as information of past and current contracts and orders (incl. invoicing details), correspondence with the user and other information which the user voluntarily provides when creating an account or modifying it or when providing feedback on our Service.
- **Information regarding your direct marketing opt-in or opt-out**
- **Information gathered with the data subject's consent** such as your location data.

Some of the personal data we collect are necessary for the proper performance of our Service. In order to register as user, you need to provide us with the user information mentioned above. Processing of certain types of your personal data requires your consent, such as processing for electronic direct marketing purposes or processing of your location data. Your consent for processing of your location data is also necessary for the proper performance of the Service.

How Do We Collect Your Data?

The data we collect is provided primarily by you. We collect and process the following data:

- Data provided by you when you register as a user to our Service or when you voluntarily provide feedback on our Service platform or via other means of communication; and
- Data that is gathered automatically when you use our Service.
- Data that is gathered from third party service providers.

To Whom Do We Disclose Data and Do We Transfer Data outside the EU or EEA?

We may disclose data described in this register to our co-operation partners and subcontractors, who facilitate our Service, assist us in analyzing the usage of our Service and provide services that are related to the performing of our Service. We will only share your personal data to the extent necessary for providing the service. Otherwise we do not disclose data from the register to external parties unless required by the legislation or an order by the authorities.

We transfer personal data outside EU/EEA as a part of our operations. When we transfer personal data, we will make sure that the personal data in question is protected in accordance with applicable laws and regulations by implementing proper safeguards, namely by using the EU commission model clauses.

How Do We Use Cookies?

Cookies are small text files that are transferred to your device while using the mobile application. Our Service and/or webpages uses cookies and other similar technologies for managing and developing the application as well as improving and analyzing the user experience. If you use our Service and/or webpages and the cookies have

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been enabled in your device settings, we deem that you have consented to the use of cookies in connection to the Service and/or webpages.

We may use the following cookies:

Necessary cookies and service provision: Cookies are essentially necessary for the proper functioning of our Service and/or webpages and they enable a good user experience. These cookies do not collect information that would enable us to identify the user.

Functionality cookies: These cookies enable personalized content and recognize and remember your preferences when you return to the application.

Statistics cookies: These cookies can be used to improve the functioning of the Service and/or webpages. We receive information about how the application is used, e.g. which parts of our application are the most popular and how long users stay on the site while using the application.

Social media and marketing cookies: By using these cookies, we can make the content of the Service and/or webpages as individually customized as possible, and thereby show e.g. targeted advertisement and content based on the user's prior behavior. By using these cookies, we can find in more detail which companies visit our webpage and identify possible sales leads.

Our website may include links and connections to third party websites. These third-party services and applications offered in connection to the Service and/or webpages are subject to the privacy policies or notices of such third parties. We recommend you to familiarize yourself with such third party privacy policies or notices.

You can review and manage your cookie settings and consent at any time on [Manage Cookies -subpage](#) or by modifying the settings on your device. Please note that by blocking or deleting cookies you may not be able to take full advantage of the Service.

How Do We Protect and Store Your Data?

We use appropriate technical and organizational measures to protect your personal data. The data we collect and obtain is stored into secure physical environments with limited access and databases protected by firewalls and passwords. The personnel and processors of personal data are obliged to keep the data strictly confidential, and each user has a user ID and password to the systems where personal data is stored.

The personal data are stored for the period necessary to fulfill the purposes outlined in this Privacy Policy. After that, the data will be deleted within a reasonable timeframe or rendered anonymous. We store data in accordance with applicable legislation, and regularly review the need for storage of personal data. The retention period for log data is 30 days.

Children's Privacy

These Services do not address anyone under the age of 13. We do not knowingly collect personally identifiable information from children under 13. In the case we discover that a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us so that we will be able to do necessary actions.

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What Are Your Rights as a Data Subject?

As a data subject you have the right, according to GDPR, to verify whether we have processed your personal data. You also have the right to access your personal data stored in this register, and the right to require rectification or erasure of that data. You also have the right to transmit your data to another controller.

When the processing of personal data is based on your consent, you have the right to withdraw that consent at any time. The withdrawal of your consent does not affect the lawfulness of processing based on consent before the withdrawal. When we process information regarding your location, the processing is always based on your consent. You can also deny any direct marketing and withdraw your consent regarding electronic direct marketing by following the instructions received in connection to the marketing communication.

You also have the right to object to the processing of your personal data or request restricting the processing, as well as the right to lodge a complaint with a supervisory authority.

Requirements and requests concerning your rights as a data subject should be submitted in writing to the address mentioned above in section "Contact Information".

Changes to this Privacy Policy

We may update this Privacy Policy from time to time. Therefore, you are advised to review this page periodically for any changes. If any changes are made, we will post the amended policy on this page with an indication to the amendment date. The changes are effective immediately after they are posted on this page.

IF YOU ARE LOCATED IN NORTH AMERICA, THE FOLLOWING POLICY WILL APPLY:

Introduction

This Privacy Policy describes how Spacent Oy (Ltd) ("**we**" or "**Spacent**") processes personal information ("**data**") we collect from the individuals ("**User**", "**you**" or the "**data subject**") who use the Spacent App service and/or become Our clients or potential clients. "*Personal information*" means any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person.

In this Privacy Policy, you will find information on what types of data are collected, how the data is collected, used, stored, disclosed and protected, and what your rights are as a data subject. You will also find information about our cookie policy and how to contact us should you have any questions regarding this Privacy Policy.

The Spacent App is a service provided by Spacent Oy (Ltd) at no cost and it is intended to be used as a platform for flexible workspace services for companies (the "**Service**"). This Privacy Policy applies to all individuals whose data is processed in relation to the Service provided by Spacent, whether such data is collected through the Service, or in email, text or other electronic communications sent through or in connection with the Service.

Spacent processes your data in Europe, and in accordance with the EU General Data Protection Regulation (2016/679), ("**GDPR**") and other applicable privacy and data security laws in your jurisdiction (including without limitation, Canada's *Personal Information Protection and Electronic Documents Act*).

We will only use your data in accordance with this Privacy Policy unless otherwise required by applicable law. We take steps to ensure that data that we collect about you is adequate, relevant, not excessive, and used for limited purposes.

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This Privacy Policy does not apply to data collected other than in respect of the Service, or to data that you provide to or is collected by any third party. These third parties may have their own privacy policies, which we encourage you to review before providing data on or through them.

If you do not agree with our policies and practices, do not download, register with, or use the Service. By downloading, registering with, or using the Service, you indicate that you understand, accept, and consent to the practices described in this Privacy Policy.

Changes to this Privacy Policy

This Privacy Policy may change from time to time. Your continued use of the Service after we make changes indicates that you accept and consent to those changes, so please check this Privacy Policy periodically for updates. We will notify you in advance of any material changes to this Privacy Policy and obtain your consent to any new ways that we collect, use, and disclose your data.

We include the date this Privacy Policy was last revised at the top of the page. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically visiting this Privacy Policy to check for any changes.

How Do We Collect Your Data?

The data we collect is provided primarily by you. We collect and process the following data:

- Data provided by you when you register as a user for our Service or when you voluntarily provide feedback through our Service or via other means of direct communication with us; and
- Data that is gathered using automated technologies when you use our Service.
- Data that is gathered from third party service providers.

What Data Do We Collect and Process?

We collect process and process the following types of data:

- **User Information** such as user's name, telephone number, email address and information relating to payments and invoicing.
- **Log Information** such as the IP address of your device, name and identification number of your device, operating system version, the configuration of the Spacent App when utilizing our Service, the time and date of your use of the Service, cookies and other statistical or aggregated information.
- **Information about our relationship with you and your account** such as information of past and current contracts and orders (incl. invoicing details), correspondence with the user and other information which the user voluntarily provides when creating an account of modifying it or when providing feedback on our Service.
- **Stored information and files.** The Spacent App may also access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.
- **Information regarding your consent to receive electronic communications from us for marketing purposes**
- **Information gathered with the data subject's consent, as may be required given the nature of the information,** such as your location data.

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Some of the data we collect is necessary for the proper performance of our Service. In order to register as user, you need to provide us with the user information mentioned above. Collection and/or processing of certain types of data requires your consent, such as processing for electronic direct marketing purposes or processing of your location data. Your consent for processing of your location data is also necessary for the proper performance of the Service.

We provide an opportunity for any user to unsubscribe from our electronic communications or opt-out of contact for marketing purposes on an ongoing basis by using the unsubscribe mechanism at the bottom of our emails, or emailing to hello@spacent.com.

How and Why we Process and Use Your Data

We process data only when there is a legal basis for the processing, and we only process data that is relevant for the purposes for which it was collected or obtained. We only process your data where there is an *agreement in place between us for providing the Service, by reason of our legitimate interests* (for e.g. customer relationship management and the delivery of our service) and *with your consent*.

We process data for the purposes of the delivery and development of our Service, processing your order and managing your account, marketing (including direct and/or targeted marketing, profiling for marketing purposes), managing the customer relationship (including providing notices about your account and to carry out our obligations and enforce our rights in any contracts with you, e.g. for billing and collection or to comply with legal requirements), generating statistical information, and analyzing the usage of our Service. We also generate statistics regarding organizational level usage for an organization that offers Spacent service for their employees in order to analyze and optimize the use of Service. We may also use data that we collect about you or that you provide to us for any other purpose with your consent. We track the usage of our Service to develop the Service and offer you a better user experience. We generate statistics regarding usage in the case of an error in the Service.

We use location information to present you reservable workspaces near you rather than anywhere in the world.

We may use the information we have collected from you to display advertisements to our advertisers' target audiences. Even though we do not disclose your data for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

To Whom Do We Disclose Data and Do We Transfer Data Across Borders?

We may disclose data described in this Privacy Policy to our co-operation partners and subcontractors, or other service providers who facilitate our Service, assist us in analyzing the usage of our Service and provide services that are related to the performing of our Service. We will only share your data to the extent necessary for providing the Service, to fulfill the purpose for which you provide it, and/or with your consent.

We may disclose data to advertisers and advertising networks that require the information to select and serve relevant advertisements to you and others. We do not disclose data about identifiable individuals to our advertisers, but we may provide them with aggregate data about our users (for example, we may inform them that 400 women between 30 and 45 have clicked on their advertisement on a specific day). We may also use such aggregate data to help advertisers target a specific audience (for example, men in a specific location). We may use the data we collect from you to display our advertisers' advertisements to their target audiences.

We may also disclose data to our subsidiaries and affiliates, according to applicable law to a buyer or other successor in the event of a merger, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets where data is among the assets being transferred, to comply with any court order, law or legal

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process (including to respond to any government or regulatory request) according to applicable law, to enforce our rights arising from any contracts between you and us (including the Service EULA (as applicable) and for billing and collection), and if we believe disclosure is necessary or appropriate to protect our rights, property or the safety of others (this may include exchanging information with other organizations for fraud prevention and credit risk reduction).

Otherwise, we do not disclose your data to external or third parties unless required by applicable law.

To the extent we transfer data, the recipients are contractually obligated to keep the data confidential, to use it only for the purposes for which we disclose it to them, and to process the data with the standards set out in this Privacy Policy.

We transfer data outside EU/EEA as a part of our operations. When we transfer data, we will make sure that the data in question is protected in accordance with applicable privacy and data security laws by implementing proper safeguards, namely by using the EU commission model clauses.

We may process, store, and transfer your data in and to other countries with different privacy laws that may or may not be as comprehensive as Canadian laws. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your data. Whenever we engage a service provider, we require that its privacy and security standards comply with this Privacy Policy and applicable law.

How Do We Use Cookies?

Cookies are small text files that are transferred to your device while using the Service. Our Service uses cookies and other similar technologies for managing and developing the application as well as improving and analyzing the user experience. If you use our Service and/or webpages and the cookies have been enabled in your device settings, we deem that you have consented to the use of cookies in connection to the Service and/or webpages.

We may use the following cookies:

Necessary cookies for Service provision: Cookies are essentially necessary for the proper functioning of our Service and/or webpages and they enable a good user experience. These cookies do not collect data that would enable us to identify the user.

Functionality cookies: These cookies enable personalized content and recognize and remember your preferences when you return to the Service.

Statistics cookies: These cookies can be used to improve the functioning of the Service and/or webpages. We receive information about how the application is used, e.g. which parts of our application are the most popular and how long users stay on certain page(s) while using the Service.

Social media and marketing cookies: By using these cookies we can make the content of the Service and/or webpages as individually customized as possible, and thereby show targeted advertisements and content based on the user's prior behavior.

Our Service may include links and connections to third party services and applications. These third party services and applications are subject to the privacy policies or notices of such third parties. We recommend that you familiarize yourself with such third party privacy policies or notices. We do not control these third parties or their tracking technologies. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

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You can review and manage your cookie settings and consent at any time on [Manage Cookies -subpage](#) or by modifying the settings on your device. Please note that by blocking or deleting cookies you may not be able to take full advantage of the Service.

How Do We Protect and Store Your Data?

We use appropriate technical and organizational measures to protect your data. The data we collect and obtain is stored into secure physical environments with limited access and databases protected by firewalls and passwords. The personnel and processors of data are obliged to keep the data strictly confidential, and each user has a user ID and password to the systems where data is stored.

The safety and security of your data also depends on you. Where we have given you (or you have chosen) a password for access to certain parts of our Service, you are responsible for keeping it confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet and mobile platforms is not completely secure. Although we do our best to protect your data, we cannot guarantee the security of your data transmitted through the Service. Any transmission of data is at your own risk. Except as otherwise required by applicable privacy and data security laws, we are not responsible for circumvention of any Service privacy settings or security measures.

The data is stored for the period necessary to fulfill the purposes outlined in this Privacy Policy (including for the purposes of satisfying any legal accounting or reporting requirements). After that, the data will be deleted within a reasonable timeframe or rendered anonymous and de-identified. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent, to the extent permitted by applicable privacy and data security laws. We store data in accordance with applicable privacy and data security laws, and regularly review the need for storage of data. The retention period for log data is 30 days.

Children's Privacy

Our Service is not offered to anyone under the age of 13. We do not knowingly collect data from children under the age of 13. In the case we discover that a child under 13 has provided us with data, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with data, please contact us so that we can delete that data.

What Are Your Rights as a Data Subject?

It is important that the data we hold about you is accurate and current. Please keep us informed if any of your data changes. As a data subject you have the right, according to GDPR and other applicable privacy and data security laws, to verify whether we have processed your data. You also have the right to access your data stored by us, and the right to require rectification or erasure of that data. Please note that we may not accommodate a request to change your data if we believe the change would violate any applicable law or cause the data to be incorrect. Additionally, applicable law may allow or require us to refuse to provide you with access to some or all of the data that we hold about you, or we may have destroyed, erased, or made your data anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your data, we will inform you of the reasons why, subject to any legal or regulatory restrictions. You also have the right to transmit your data to another controller.

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When the processing data is based on your consent, you have the right to withdraw that consent at any time. The withdrawal of your consent does not affect the lawfulness of processing based on consent before the withdrawal. When we process data regarding your location, the processing is always based on your consent. You can also deny any direct marketing and withdraw your consent regarding electronic direct marketing by following the instructions received in connection to the marketing communication, or by contacting us. Please note that if you withdraw your consent we may not be able to provide you with a particular product or service. We will explain the impact to you at the time to help you make your decision.

You also have the right to object to the processing of your data or request restricting the processing, as well as the right to lodge a complaint with a governmental or supervisory authority.

Requirements and requests concerning your rights as a data subject should be submitted in writing to the address mentioned below in section "Contact Information".

Contact Us

We welcome your questions, comments, and requests regarding this Privacy Policy and our privacy practices. Please contact us at:

Attn: Kalle Hallivuori, kalle.hallivuori@spacent.com

Spacent Oy (Ltd)

Yliopistonkatu 4, 00100 Helsinki, Finland

hello@spacent.com

We have procedures in place to receive and respond to complaints or inquiries about our handling of data and our compliance with this Privacy Policy and with applicable privacy and data security laws. To discuss our compliance with this Privacy Policy please contact our Privacy Officer/Controller using the contact information listed above.