

Privacy Policy

Spring Hub coworking space

Latest update: 13.10.2021

We at Spring Hub are committed to protecting the privacy and security of your personal data that we process or control. This Privacy Policy gives you an overview of how we collect and use information when you use any of the services located on our website at www.springhub.org (the "Website") or if you use any other services (the "Services") that we provide to you or when you give us your information. We collect your personal information on our website www.springhub.org or Facebook page <https://www.facebook.com/SpringHubTallinn>.

By using or interacting with the Website or our Services, you, as a user of our website, Facebook page or as our client, ("User", "Client" or "you") agree to the provisions of this Policy and confirm that you have read and understood all of the provisions stated in the Policy. We process Personal Data under this Privacy Policy and in accordance with applicable legislation, including the General Data Protection Regulation (2016/679) (the "GDPR") and the applicable national data protection laws in Estonia ("Data Protection Law").

1. The scope of the Policy

This Policy describes how we process Personal Data in connection with:

- all matters related to our clients, former clients and potential clients;
- newsletters and marketing information;
- recruitment processes;
- the cookies that are used on our Website;
- all of our statutory obligations with respect to the GDPR, any relevant Data Protection Law, and any other laws and regulations that may be applicable).

2. Purposes, means and retention terms of data processing

a) News, publications and events: We may use the information that you have provided (name, title, position, your e-mail address, any provided phone numbers, your address and other information) to send you news about the latest developments at Spring Hub, the scope of services that we provide to you, as well as information about any upcoming events that may be of interest to you, including educational seminars. We will use your Personal Data for this purpose until you inform us that you no longer wish to receive such information from us.

b) Cookies: We use cookies to obtain information about your use of our Website. Cookies allow us to provide you with a more streamlined and accessible experience when using the Website. Third-party cookies help us to improve the relevancy of the advertisements we run in different

channels. The information generally does not comprise any data that would allow us to individually identify you as a natural person.

c) Marketing materials, offers, bookings: We may use the information that you have provided (name, your e-mail address) to send you information regarding your bookings or any offers and marketing materials that are related to our Services.

3. The legal basis for processing your Personal Data

We process your Personal Data on the basis of:

- your consent;
- legal agreement between us that establishes a basis for data processing;
- legal obligations to which we are subject; and / or
- our legitimate interest to ensure the quality of our services.

We limit the processing of your Personal Data to the scope of purpose for which the data was collected. Access to your Personal Data will be restricted to personnel who are required to process the Personal Data to fulfil their professional responsibilities and their duties to you as the Client. Your Personal Data is not stored or processed longer than is necessary with respect to the data processing purposes that we have listed above.

We have taken the appropriate technical and organizational measures to ensure the secure processing of your Personal Data. Your data will be processed in such a manner to ensure confidentiality and data integrity.

5. Your rights as a data subject

We have an obligation to ensure that your Personal Data is kept accurate and up to date. We kindly ask you to assist us to comply with this obligation by ensuring that you inform us of any changes that have to be made to any of your Personal Data that we are processing.

You may, at any time, exercise the following rights with respect to our processing of your Personal Data:

a) Right to access: You have the right to request access to any data that can be considered your Personal Data. This includes e.g. the right to be informed on whether we process your Personal data, what Personal Data categories are being processed by us, and the purpose of our data processing.

b) Right to rectification: You have the right to request that we correct any of your Personal Data if you believe that it is inaccurate or incomplete.

c) Right to object: You are entitled to object to certain processing of Personal Data, including for example, the processing of your Personal Data for marketing purposes or when we otherwise base our processing of you on a legitimate interest.

d) Right to erasure: You may also request that your Personal Data be erased if the Personal Data is no longer necessary for the purposes for which it was collected, or if you consider that

the processing is unlawful, or if you consider that the Personal Data has to be erased to enable us to comply with a legal requirement.

e) Right to data portability: If your Personal Data is being automatically processed with your consent or on the basis of a mutual contractual relationship, you may request that we provide you that Personal Data in a structured, commonly used and machine-readable format. Moreover, you may also request that the Personal Data is transmitted to another controller. Bear in mind that the latter can only be done if that is technically feasible.

f) Right to withdraw your consent: In cases where the processing is based on your consent, you have the right to withdraw your consent to such processing at any time.

g) Opt-out from marketing: We will also give you the opportunity to opt out of our communication with you whenever we send you information about the Firm, the events that we organize or any other information that we believe may be of interest to you. Additionally, you can also opt out at any time by contacting us.

If you have complaints on how we process your Personal Data, or you would simply like to know more about our data processing activities, feel free to contact us at any time by using the information noted in the last section of this Policy.

You do have the right to lodge a complaint with a Data Protection Authority (“DPA”) if you think that your Personal Data is being processed incorrectly or your data subject rights have been violated by us. You can lodge a complaint by contacting the DPA that is local to your jurisdiction i.e. the location of the alleged violation of your data subject rights or the inappropriate processing of your data, or the place you live and work. The Estonian Data Protection Inspectorate in Estonia: <http://www.aki.ee/en>

6. The location of the processing of your data

We store and process Personal Data within the European Union. By submitting your Personal Data to us or by consenting to the processing of your Personal Data you agree to the processing of your data, including data storage. We will take all reasonably necessary precautions to ensure that your data is treated securely and in accordance with the applicable Data Protection Laws. We will not store any of your Personal Data longer than necessary to fulfil the purposes set out in this Policy. For example, we may transfer your Personal Data based on:

- an adequacy decision by the European Commission;
- standard data protection clauses elaborated by the European Commission;
- standard data protection clauses elaborated by a DPA;
- using other possible safeguards and derogations where it is allowed by the applicable laws.

As with all of your Personal Data, you may request that we inform you on the details of the processing of your Personal Data on the basis of Article 15 of the GDPR. You may, as with the exercise of any your rights as a data subject, do so by contacting us via the information that has been provided at the end of this Policy.

7. Contacts

Feel free to contact us with regards to any questions, inquiries, requests or complaints with respect to the processing of your Personal Data at: info@springhub.org

8. Changes to the Policy

We may make any changes to this Policy as we see fit. If the Policy has been changed in any way, then the newest edition of this Policy will be published on our website with the latest date. We encourage you to check whether any changes have been made to the Policy from time to time.