

X & Why Privacy Policy – Floor 7, 22 Bishopsgate

1. Introduction

At X & Why Limited ("**X & Why**", "**we**", "**us**", "**our**") we take our obligations in respect of data privacy seriously and recognise that it is important for you to understand how we make use of personal data.

This privacy policy applies to any users of part of floor 7 in 22 Bishopsgate (the "**Property**"), including, individual and company members ("**Members**"), guests of such members ("**Guests**"), and in the case of company members, employees permitted to use the Property ("**End-Users**") as well as contacts at our suppliers ("**you**", "**your**"). Please read this privacy policy carefully as it contains important information about how we use personal data that you provide to us or we collect from you/third parties about you whilst managing the Property on behalf of The Council of the City of Salford of Civic Centre, Chorley Road, Swinton, Salford, M27 5DA (the "**Landlord**").

It also explains the ways in which we will protect your personal data and sets out your rights in respect of personal data that we process about you.

2. Who we are

For the purpose of applicable data protection laws, the "data controller" (in other words, the organisation that determines how and for what purposes your personal data is used) will be X & Why Limited.

X & Why Limited is a company registered in England and Wales with company number 11571822 and registered address People's Mission Hall, 20-30 Whitechapel Road, London, E1 1EW.

This privacy policy details how we process your personal data that we are a data controller of.

Note that we may be required to share certain personal data with the Landlord who will act as an independent data controller of your personal data (see section 8 below for further details). Please ensure that you have reviewed the Landlord's privacy policy available on their website. In certain circumstances, we will act as a data processor on behalf of the Landlord (e.g. when processing bank payments on their behalf).

3. Personal data we may collect from you

We may collect different types of personal data about you in the course of managing the Property, which are set out in the X & Why Data Processing Table at section 18 below.

Data protection law recognises that certain categories of personal data are sensitive and therefore require more protection. These categories of data include information about your race or ethnic origins, political opinions, sex life or sexual orientation, religious beliefs and health data. Additionally there are further rules concerning the use of criminal data. We will not usually collect this type of data from you. If we do, we will only process this data if there is a valid reason for doing so and where the

law allows us to do so. For example, if we host an event at one of our spaces that you wish to attend, we may request your explicit consent to collect accessibility and dietary information.

4. How we collect your personal data

Personal data you provide to us directly.

You may provide personal data to us in a number of ways, including when you:

- enquire about becoming a Member of the Property or otherwise contact us;
- are onboarded as a Member of the Property (or if you are a Guest, when you visit the Property);
- sign up to and access certain services at the Property (e.g. our wellness programmes or coaching);
- purchase additional products or services at the Property;
- visit and browse our portal and app;
- register an account with us on our portal and app;
- upload content to our portal and app;
- request marketing to be sent to you;
- sign up to and attend events at the Property;
- complete one of our exit and onboarding surveys;
- provide us with feedback about any products or services we provide; and
- report a problem with our portal and app or any products or services we provide.

If you are a contact at one of our suppliers, you (or the supplier) may provide certain limited personal data to us (e.g. your business contact details) in the course of your organisation providing services to us or managing its relationship with us.

Personal data we collect or generate about you.

When you visit our portal and app, we may collect, generate, store and use certain personal data about you. In some cases we will use cookies to do this, for further information about the cookies we use please see our Cookie Policy

We may also process your personal data in the form of video or audio recordings via our CCTV if you visit the Property.

The personal data we collect about you may include but is not limited to:

- technical information including: the internet protocol (IP) address used to connect your computer to the internet; your login information (if registering or accessing an account with us); browser type and version; time zone setting; browser plug-in types and versions; device types; operating system; time and date of consent and platform; and any phone number used to call us; and
- information about your visit to our portal and app, including: the full Uniform Resource Locators (URL); clickstream to, through and from our portal and app (including date and time); page

response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); and methods used to browse our portal and app.

Personal data we receive from other sources.

We may receive personal data about you from other sources, for example if your employer has a membership with us, they may provide us with certain personal data about you to enable you to use the Property.

Personal data we collect about you via our website.

For information about how we collect, use and store personal data about you when you use our website, please see our website privacy policy <https://www.xandwhy.co.uk/privacy-notice>.

5. Why and how do we use your personal data and what is our "lawful basis" for doing so?

Whenever we process your personal data as a data controller, we are required to identify and maintain a valid "lawful basis" (i.e. a legally compliant justification) for the processing. Typically, we will rely on the fact that our processing of your personal data is necessary:

- to perform our contract with you;
- to comply with our legal obligations; and/or
- for our legitimate business interests, namely to provide you with our services and analyse the use of our services to continually improve your experience and our business.

To help you to understand specifically what we do with your personal data and why we do it, we have described the various relevant lawful bases that we rely on and the purposes for which we will use your personal data in the X & Why Data Processing Table at section 18 below.

Where we rely on our legitimate interests, we will always make sure that we assess these interests against your right to privacy before carrying out such processing and, if your rights outweigh our legitimate interests, we will not process your personal data for that purpose.

6. What if you fail to provide personal data?

Please make sure you provide us with information when requested as if you don't we may not be able to perform the contract we have entered into with you (such as, to provide you with the services you have requested). In this case, we may have to suspend or cancel a product or service you have with us. We will notify you if this action is required at the time.

7. Change of purpose

We will only use your personal data for the purposes for which we collected it. If we need to use your personal data for a purpose other than that for which it was collected, we will prior to that further processing, provide you with information about the new purpose, we will explain our legal justification

for doing so and we will provide you with any relevant further information. We may also issue a new privacy policy to you.

8. How we share your personal data

Sharing your personal data with the Landlord

We will share certain personal data about you with the Landlord in the course of managing the Property. We have entered into an appropriate data sharing agreement with the Landlord (i) which sets standards the Landlord must comply with when processing your personal data and (ii) to ensure that such sharing complies with the requirements of applicable data protection laws.

Third party suppliers and service providers involved in our contractual relationship with you

Like most businesses, we work with third party suppliers and service providers as part of the day to day operations of our business. Some of these trusted suppliers will process your personal data on our behalf and provide services to us such as IT services which are made available to you at the Property.

We will always make sure that these trusted suppliers meet agreed standards for the protection of your personal data and they will only ever be allowed to use your personal data in order to provide us with services and not for their own commercial purposes. We require all third parties to take appropriate technical and organisational security measures to protect your personal data and to treat it subject to a duty of confidentiality and in accordance with applicable data protection law.

Sharing your personal data with other entities in our group and our investors

We may share your personal data with other entities in our group and our investors as part of the administration of our business. For example, we may share personal data as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

Other scenarios in which we might share your personal data

We may also share your personal data:

- with regulators, law enforcement or fraud prevention agencies, as well as our legal advisers, courts, the police and any other authorised law enforcement bodies, for the purposes of investigating any actual or suspected criminal activity or other regulatory or legal matters etc.;
- in the event that we consider selling or buying any business or assets, to any prospective sellers or buyers of such business or assets;
- in the event of any insolvency situation (e.g. administration or liquidation);
- if we, or substantially all of our assets, are acquired by a third party, in which case your personal data will be one of the transferred assets; or
- to protect the rights, property or safety of our employees, workers, contractors, Members, or

others. This includes exchanging your personal data with other companies and organisations (including without limitation the local police or other local law enforcement agencies) for the purposes of our employee, worker, contractor and Member safety, crime prevention, fraud protection and credit risk reduction.

9. How do we protect your personal data?

We take the security of your personal data very seriously and have put in place physical, technical, operational and administrative strategies, controls and measures to help protect your personal data from unauthorised access, use or disclosure as required by law and in accordance with accepted good industry practice. We will always keep these under review to make sure that the measures we have implemented remain appropriate.

In addition, we limit access to your personal data to those employees and other third parties who have a business need to know in order to perform their job duties and responsibilities. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

10. How long do we keep your personal data?

We will retain your personal data for as long as we need it in connection with our relationship with you. This retention period may depend on whether you are visiting our portal and app, making a purchase of any products or services we provide or have an ongoing relationship with us. There may also be circumstances where we need to retain your personal data for longer than our relationship with you in order to comply with applicable laws.

Personal data which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal data where applicable.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you. In this case, we may retain such information for a longer period without further notice to you.

11. Your rights in relation to your personal data

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes so that our records can be updated. We cannot be held responsible for any errors in your personal data if this is caused by a failure by you to notify us of the relevant change.

Data protection law grants you a number of specific rights in respect of your data in addition to the broad and general right to have your data protected. We have set out some information in respect of each of those specific rights, below:

- **Right to be informed** about how your personal data will be processed. This enables you to

receive information about how we use your personal data. We have set this information out in this privacy policy.

- **Request access to your personal data** (commonly known as a "**data subject access request**"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data (commonly known as the "**right to be forgotten**"). This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.
- **Not to be subject to a decision solely based on automated processing.** We do not anticipate making decisions about you based solely on automated decision making where that decision would have a significant impact on you. If we ever make a decision about you automatically by a computer or an algorithm without human intervention you can ask us to have that decision reviewed by a human.
- **Right to withdraw consent** where we are processing personal information on the basis of your consent

If you want to exercise any of the rights set out above, please contact us (using the contact details set out below).

12. Where your personal data may be processed

We may transfer your personal data outside of the UK or EEA. In the event that we choose to transfer personal data outside of the UK and EEA we will comply with the data protection legislation when doing so including by putting in place adequate contractual safeguards with the recipient (e.g. the European Commission's standard data protection clauses and UK IDTA Addendum), to ensure the security of your personal data is maintained when it is processed by the third party.

13. Cookies

As referenced above, our portal and app uses cookies to distinguish you from other users. This helps us to provide you with a good experience when you browse our portal and app and allows us to improve our portal and app and our services.

We may also place tracking cookies in our marketing emails as this helps us to improve our marketing activities – for example, these cookies allow us to see how many people open our emails, what time of day they open our emails and whether they click through on any of the information contained in the emails.

For information on how we use cookies, please see our Cookie Policy.

14. Third-party websites

Our portal and app may, from time to time, contain links to third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for the ways in which personal data is processed on such websites. Please check the relevant policies before you submit any personal data to these websites.

15. Changes to this privacy policy

We reserve the right to update or amend this privacy policy at any time, including where we intend to further process your personal data for a purpose other than that for which the personal data was collected or where we intend to process new types of personal data. We will place any updates here on this page. This privacy policy was last updated on **[Insert Date]**.

16. Complaints

We encourage you to contact us first if you have any queries, comments or concerns about the way we handle your personal data (our details are in the section immediately below). We will try to put things right.

However, if you are not satisfied with our handling of any request by you in relation to your rights or concerns, you also have the right to make a complaint to the Information Commissioner's Office ("ICO"). You can contact the ICO at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF; 0303 123 1113; or <https://ico.org.uk/>.

17. Contact

If you have any questions about this privacy policy or how we handle your personal data, please

contact us by sending us an email to rdean@xandwhy.co.uk

18. X & Why Data Processing Table

Processing Activity (Subject Matter of Processing)	Nature and Purposes of the Processing	Type of Personal Data	Categories of Data Subject	What is our legal justification for processing your personal data
Undertaking general Property/premises management and correspondence	To facilitate the operation of the management of the Property, including carrying out health and safety and security tasks and Property capacity assessments and providing reports back to the landlord.	Names, telephone numbers, postal addresses, email addresses, job titles and roles, access card information, photographs, records of correspondence, records of transactions and any additional products or services purchased, communication preferences, IP addresses, car registration numbers, imagery (e.g. CCTV footage)	Members, Guests, End-Users, supplier contacts and any other third parties	We have to process your personal data in these ways to perform our contractual obligations to Members. We may also rely on our legitimate interests as a business to process such data (for example, it is in our interests to ensure the smooth operation of the Property).
Leasing/license data	To manage the licences/leases including associated financial transactions for the Landlord including via property management systems	Names, telephone numbers, postal addresses, email addresses, bank account details	Members, Guests, End-Users, supplier contacts and any other third parties	We have to process your personal data in these ways to perform our contractual obligations to Members and/or suppliers.
Population of premises management databases	To administer the management of the Property: produce invoices, monitor payments, operating budget,	Names, telephone numbers, postal addresses, email addresses, job titles	Members, Guests, End-Users, supplier contacts and any other third parties	We have to process your personal data in these ways to perform our contractual obligations to Members.

Processing Activity (Subject Matter of Processing)	Nature and Purposes of the Processing	Type of Personal Data	Categories of Data Subject	What is our legal justification for processing your personal data
	storing license details etc			
Operation of marketing activities for the Property (and other X&Why sites)	To market the Property (and other X&Why sites) and general communication	Names, telephone numbers, postal addresses, email addresses, IP addresses	Members, third parties interested in joining	Unless we are contacting you in a business to business capacity, we will only use your personal data to send you electronic marketing messages if we have consent from you to do so (or if you are an existing Member and have not opted out of receiving marketing materials). Where we send marketing to you in a professional capacity or otherwise carry out research or analyse our advertising, we will rely on our legitimate interests to send these types of communication (our legitimate interest in marketing and advertising our services) and conduct such activities. You can opt out from marketing communications [by using the unsubscribe links within our marketing messages, or] by contacting us at any time at the contact details set out at below.
Professional services advice for the Property	In the operation of the Property, obtaining professional services advice, including, anti-money laundering, PEP, adverse media, sanctions, watchlists and checklists	Names, addresses	Members, Guests, End-Users, suppliers and any other third parties	In some circumstances we will use your personal data because it's necessary for us to comply with a legal obligation. In other cases we will rely on our legitimate interests, i.e. ensuring that we provide services to and contract with individuals/businesses who conduct business in a responsible manner.
CCTV operation and recording, ANPR camera operation, access in and out of the Property	To record accidents, near misses, incidents within the Property, for crime prevention and public safety	CCTV images, photographs, vehicle registration numbers, movement and actions of individuals, date and time of	Members, Guests, End-Users (or other individuals present at the Property)	We have a legitimate interest to ensure the safety of and prevention of any crimes committed against our staff, our Members, Guests, End-Users and our properties. In some circumstances we will use your personal data because it's necessary for us to comply with a legal obligation (for example, in the event of any criminal investigations,

Processing Activity (Subject Matter of Processing)	Nature and Purposes of the Processing	Type of Personal Data	Categories of Data Subject	What is our legal justification for processing your personal data
		entry/exit from estate		we may be required by law, to share the data captured with the relevant authorities.).
NHS Test and Trace	To help minimise the transmission of Covid-19 and support public health and safety	Any information we may need to help the NHS Test and Trace respond to local Covid-19 outbreaks (including your contact details, your date of visit to our Property and your arrival and departure time)	Members, Guests, End-Users (or other individuals present at the Property)	Depending on the particular circumstances, the current legislation and the available guidance at the time, we may rely on either a legal obligation or a range of legitimate interests in order to process data about you in the context of the Covid-19 pandemic. It is in the legitimate interests of you, us and a range of public authorities to tackle local Covid-19 outbreaks by keeping records of visitors to our Property for contact tracing purposes.
Accident investigation, insurance claims	Information required for investigation purposes and follow up welfare	Names, addresses, telephone numbers, email addresses, car registration numbers	Members, Guests, End-Users (or other individuals involved in accidents at the Property)	We will rely on our legitimate interests as a business to process such data (for example, it is in our interests to investigate claims in respect of the Property to ensure that we provide a safe and inclusive working space and to process any insurance claims relating to accidents that occur).
Creation of parking or biking permits, payment for parking services	To track and manage parking at the Property	Names, place of work, contact numbers, vehicle registration numbers	Members, Guests, End-Users (or other individuals parking at the Property)	We have to process your personal data in these ways to perform our contractual obligations to Members.
Exit and onboarding surveys	To understand and improve user experience	Age, gender, postcode, mode of transport, dwell time, distance travelled	Members, End-Users	We will rely on our legitimate interests as a business to process such data (for example, it is in our interests to understand and improve user experience).
Guest management	To manage Guests and access to Wi-Fi	Name, email address, phone number, company name	Guests	We have to process your personal data in these ways to perform our contractual obligations to Members.
Visitor log book, permit requests to access and	To manage security access and health and	Name, email address, phone	Guests (or other visitors to	We will rely on our legitimate interests as a business to process such data (for example, it is in our

Processing Activity (Subject Matter of Processing)	Nature and Purposes of the Processing	Type of Personal Data	Categories of Data Subject	What is our legal justification for processing your personal data
carry out works on the Property	safety at the Property	number, company name	the Property)	interests to ensure that we provide a safe and inclusive working space).
Wi-Fi user registration and acceptance via email	To provide a Wi-Fi service for Members, Guests, End-Users	Name, Email address and phone ID, IP address	Members, Guests, End-Users	We have to process your personal data in these ways to perform our contractual obligations to Members.
Complaints process	To understand and improve user experience	Name, email address, contact number	Members, Guests, End-Users	We will rely on our legitimate interests as a business to process such data (for example, it is in our interests to understand and improve user experience).
Public liability claims defence and investigation	To defend and investigate public liability claims	Information regarding public liability claims investigations.	Members, Guests, End-Users (or other individuals present at the Property)	In some circumstances we will use your personal data because it's necessary for us to comply with a legal obligation. In other cases we will rely on our legitimate interests, i.e. to protect our business, interests and rights.
Legal or third party claims	To defend or prosecute and investigate legal/other claims or prevent misuse of services	Information regarding claims or misuse of services	Members, Guests, End-Users (or other individuals present at the Property)	In some circumstances we will use your personal data because it's necessary for us to comply with a legal obligation. In other cases we will rely on our legitimate interests, i.e. to protect our business, interests and rights.
X & Why portal and app	To manage meeting room bookings, review other members, receive notifications, see any events/socials, review account, see benefits, book office desks and How to Guides	User name and related login information for portal. Records of correspondence, records of transactions and any additional products	Members, End-Users	We have to process your personal data in these ways to perform our contractual obligations to Members.
Services review	To review and improve products and services	Records of correspondence, records of transactions and any additional products or	Members, End-Users	We will rely on our legitimate interests as a business to process such data (for example, it is in our interests to review and improve products and services).

Processing Activity (Subject Matter of Processing)	Nature and Purposes of the Processing	Type of Personal Data	Categories of Data Subject	What is our legal justification for processing your personal data
		services purchased		
Events at the Property	To organise and host events at the Property	Food allergies, Name, email address, phone number, vehicle registration numbers, company name, imagery (e.g. CCTV footage), bank account details	Members, Guests, End-Users	We will rely on our legitimate interests as a business to process such data (for example, it is in our interests to process personal data in the organisation and hosting of events at the Property). Note that if you have opted out of receiving marketing from us we will not notify you of such events via email.
Engaging suppliers	To enable us to manage our relationship with, and receive services from, our suppliers	Business contact details, including name, e-mail address, phone number (including mobile number) and job role	Supplier contacts	We will rely on our legitimate interests as a business to process such data (for example, it is in our interests to manage our relationship with, and receive services from, our suppliers).