

THE PROJECTS BRIGHTON LTD

PRIVACY POLICY

Last Updated: August 02, 2023



1. INTRODUCTION

The Projects Brighton Ltd values your privacy and is dedicated to upholding your trust by safeguarding your personal data. This Privacy Policy ("Policy") outlines how The Projects Brighton Ltd collects, utilises, shares or otherwise handles data that, either alone or combined with other information, allows for your direct or indirect identification ("Personal Data"). Additionally, it explains the rights you have concerning your Personal Data.

This Policy aims to provide you with insight into how The Projects Brighton Ltd processes your Personal Data in the following scenarios:

- When you engage with us on our websites that display or link to this Policy.
- When you use our products and services, including our software and technology platform and applications made available for online or mobile device usage, where we act as a controller of your Personal Data.
- When you function as a service provider, supplier or vendor to The Projects Brighton Ltd.
- When you register for, attend or participate in our events, programs, promotions, or contests.
- When you receive communications from us or interact with us in other ways.
- When you subscribe to receive our newsletters, updates or other communications.
- When you participate in surveys, research or other similar data collection activities facilitated by The Projects Brighton Ltd.
- When you are employed by or affiliated with an organisation or institution that uses our products and services and your Personal Data has been shared with us in our capacity as a controller (e.g. to authorise your access to your employers, educational institutions or another organisations account).
- When you access our locations as a member, service provider or an attendee at an event hosted or co-hosted by The Projects Brighton Ltd.

2. WHO WE ARE

The Projects Brighton Ltd and its affiliated entities take responsibility for managing your Personal Data in accordance with the guidelines outlined in this Policy. Unless specified otherwise, we act as the controller for this Personal Data, meaning we determine the purposes and methods of its collection and use. Depending on your location or where you interact with us, the specific entity within The Projects Brighton Ltd acting as the controller may vary.

When we refer to "The Projects Brighton Ltd," "we," "our," or "us," we are referring to the relevant entity within The Projects Brighton Ltd that holds the role of the controller for your Personal Data.

3. PERSONAL DATA WE COLLECT

As a UK provider of flexible workspace solutions, we gather various types of Personal Data related to your interactions with us and your usage of our products and services. Below, we present the types of personal data we may collect. However, please be aware that not all categories may be relevant to you.

- a) Contact Information: Information like your name, email address, physical address, phone number, date of birth, employer or educational institution name and your role concerning the use of our products and services, along with other contact details where applicable.
- b) Payment Information: Data related to your billing address and payment method, such as bank details, credit card, debit card or other payment card information.
- c) Activity & Usage Data: Information linked to your usage and activities with our products and services, including Membership Activity & Usage Data such as keycard and/or mobile key access records (e.g., date and time of entry or scan at access points), desk and office booking data, printer usage details, credit usage data, desk location data and other data relevant to your usage of our workspaces and membership offerings.
- d) Security Details: Data like images and video footage captured by closed-circuit television (CCTV), access data logs and information collected in connection with security incidents involving you, all pertaining to the safety and security of our locations.
- e) Additional Identification Data: Data including government-issued identity documents, photographs and other information gathered to verify identity, age and prevent fraud.
- f) Account Details: Data associated with your account at The Projects Brighton Ltd such as your chosen username, password, profile picture, and designated "home" location within The Projects Brighton Ltd.
- g) Event Data: Information collected for event and webinar registration and participation, including attendee badge details (e.g., name, title, company name and image), email address and photographs and videos taken during events.
- h) Device, Internet & Network Activity Information: Data which might identify your device, such as device ID or other unique identifiers, or data about your device, such as browser type and geolocation information (if your device settings allow for this), IP address, MAC address and other data related to your device and activity on our websites, mobile applications, emails and online content (as applicable under data protection laws).
- i) Vehicle Information: Data concerning your vehicle, such as vehicle registration and licence plate numbers, to facilitate parking at our locations.
- j) Other Voluntary Personal Data: Data such as the content of your communications with us, including interactions with customer support and our social media channels, participation in surveys, questionnaires, contests, or other promotional offers, data you provide when subscribing to receive news, promotions, or other marketing communications from us or our partners and any other information you willingly share with us.

In specific situations, we may collect the following categories of Personal Data:

1) Medical & Health Data: Data collected in connection with incidents or medical emergencies involving you at our locations.

2) Other Sensitive Personal Data: Data collected with your consent and used as necessary to perform reasonably expected services or as required by law. We kindly request that you avoid providing any Sensitive Personal Information unless specifically requested.

4. HOW WE COLLECT YOUR PERSONAL DATA

4.1 Directly from You

The majority of your Personal Data is collected directly from you and the specific categories of Personal Data we collect depend on your interactions with us. For instance, when you sign up or activate a membership with The Projects Brighton Ltd, contact us with inquiries about our products or services, access our locations, use our mobile application, participate in surveys, engage with our websites, attend events or webinars, or provide services to us, you may provide us with relevant Personal Data. In certain situations, providing the requested Personal Data may not be mandatory. If you choose not to provide specific Personal Data or decide to opt-out of our processing of your Personal Data (where applicable), you have that right. However, it's important to note that in some cases, the provision of certain Personal Data may be necessary for us to offer our products or services to you or to address your requests effectively.

4.2 From Automated Methods, Devices and Our Network

In addition to direct data collection, we may also gather your Personal Data through automated means and devices without explicitly requesting the information from you. This is standard practice for businesses that operate online and employ technology. The data collected through this method primarily includes information automatically obtained through your interactions with our websites, mobile application, emails and online content. Such data encompasses Device, Internet, and Network Activity Information as well as other details gathered through cookies, web beacons and similar technologies.

4.3 From Other Sources

SOURCE	SITUATION (EXAMPLES)
Your Employer, Educational Institution, or Other Organisation	Inviting you to activate your membership or account and authorising your access to your employer's, educational institution's, or other organisation's account for contracted products and services.
Projects Membership	As a normal part of conducting business and to enable your use of our products and services. For instance, if you access and use multiple products and services, such as the Projects Members app for accessing Projects membership services.
Authentication Partners	Authenticating and administering access to your Projects account using third-party authorisation procedures, such as single sign-on (SSO) providers.
Your Friends, Family Members, or Close Acquaintances	- When referred by them to use our products and services.
Third-Party Space Booking Platform Providers	- Facilitating bookings at Projects locations that you reserve through third-party space booking platforms.
Real Estate Brokers	- Facilitating transactions with you for our products and services.
Our Agents, Consultants, Partners, and Service Providers	Assisting with the provision and promotion of our products and services, as well as the performance of business-related functions, such as payment partners and merchants, advertising and marketing partners.
Our Landlords/Building Owners and Managers	Facilitating access and security at buildings where we have workspaces.
Event Sponsors	Managing registration and participation in events hosted at our locations.
Data Brokers and Publicly-Available Sources	Helping us correct or supplement our records for marketing campaigns, offers and online advertising efforts, or assisting with sales activities.
Other Third Parties Acting at Your Direction	Facilitating your use of our products and services as per your directions.

5. PURPOSES FOR PROCESSING YOUR PERSONAL DATA AND LEGAL BASIS

At The Projects Brighton Ltd, we are committed to ensuring that your Personal Data is processed lawfully, in line with data protection laws. Under GDPR regulations, the law mandates that we have a valid legal basis for processing your data. In most cases, we rely on our legitimate interests or those of third parties (except when they are outweighed by your interests or fundamental rights and freedoms), fulfilling contractual obligations with you or complying with legal requirements. Additionally, we may process your Personal Data to protect vital interests, further important public interests, or rely on your consent, whether implied (e.g., when you voluntarily provide information for our use) or expressed as permitted by applicable law.

If we process your Personal Data based on your consent, you have the right to withdraw your consent at any time for activities solely reliant on your consent by contacting hello@projectsclub.co.uk at any time.

To provide a clearer understanding of the purposes for processing your Personal Data and the legal basis on which we rely, we have categorised this information in the following sections and tables. For additional information regarding the legal bases for processing your Personal Data, kindly reach out to us at hello@projectsclub.co.uk

5.1 The Projects Brighton Ltd Membership Products and Services

PURPOSE OF PROCESSING YOUR PERSONAL DATA	CATEGORIES OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
To manage your Projects membership account and, if applicable, grant access to your employer, educational institution or another organisation's <i>account</i> .	<ol style="list-style-type: none">1) Contact Details2) Account Information	<ul style="list-style-type: none">- Performance of a contract with you, if you contract for The Projects Brighton Ltd membership products and services.- Our legitimate interests, specifically to enable account activation and access to our products and services if your membership is connected to your employer, educational institution, or another organisation's contract for membership products and services.
To verify age eligibility for restricted products (e.g., alcohol).	<ol style="list-style-type: none">1) Contact Details2) Supplemental ID Information	<ul style="list-style-type: none">- Compliance with legal obligations concerning the provision of age-restricted products.

<p>To enable physical access to our locations using key fobs or mobile keys (where applicable)</p>	<ol style="list-style-type: none"> 1) Contact Details 2) Account Information 3) Supplemental ID Information 	<ul style="list-style-type: none"> - Performance of a contract with you, if you contract for The Projects Brighton Ltd membership products and services. - Our legitimate interests, specifically to fulfil contractual obligations with your employer, educational institution, or another organisation and enable access to workspaces related to your affiliation with the organisation, if your membership is connected to your employer, educational institution, or another organisation's contract for membership products and services
<p>To provide our membership products and services, including access to The Projects Brighton Ltd offices, workspaces, member network, shared Internet connection, printers, and exclusive benefits and promotions.</p>	<ol style="list-style-type: none"> 1) Contact Details 2) Account Information 3) Membership Activity & Usage Information 4) Other Voluntary Personal Data 	<ul style="list-style-type: none"> - Performance of a contract with you, if you contract for The Projects Brighton Ltd membership products and services. - Our legitimate interests, specifically to fulfil contractual obligations with your employer, educational institution, or another organisation and enable access to workspaces related to your affiliation with the organisation, if your membership is connected to your employer, educational institution, or another organisation's contract for membership products and services.
<p>To facilitate and manage parking at our locations, where applicable.</p>	<ol style="list-style-type: none"> 1) Contact Details 2) Account Information 3) Vehicle Information 	<ul style="list-style-type: none"> - Performance of a contract with you, if you contract for The Projects Brighton Ltd membership products and services. - Our legitimate interests, specifically to enable parking access at our locations related to your affiliation with the organisation, if your parking access is connected to your employer, educational institution, or another organisation's contract for parking services.

<p>To facilitate access control and security measures at our locations.</p>	<ol style="list-style-type: none"> 1) Contact Details 2) Account Information 3) Security Information 	<p>- Our legitimate interests, specifically to ensure the safety and security of our offices, employees, members, and visitors and fulfil contractual obligations with our landlords, building owners, and managers, requiring us to collect and provide such data to enhance access control and security measures at the building facilities housing our offices and workspaces.</p>
<p>To monitor, analyse, and report on your membership activity and usage patterns, including access, reservations, bookings, printer usage, credit usage, and capacity management.</p>	<ol style="list-style-type: none"> 1. Contact Details 2. Account Information 3. Membership Activity & Usage Information 	<p>- Our legitimate interests, specifically to assess how you utilise our products and services to enhance and tailor our offerings, provide accurate reporting, and ensure compliance with applicable terms and conditions.</p> <p>- In cases where we share your Membership Activity and Usage Information with your employer, educational institution, or another organisation (when your membership account is associated with such organisation):</p>
<p>To enable participation in exclusive benefits and promotions offered by select third-party partners (including sharing your Personal Data with select partners to contact you regarding their products and services related to your membership).</p>	<ol style="list-style-type: none"> 1. Contact Details 2. Account Information 	<p>- Our legitimate interests, specifically to provide access to related goods and services that enhance your membership experience.</p>

5.2 The Projects Brighton Ltd Workplace Platform (IOS and Android App)

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
To register and activate your Projects user account and to authorise your access to The Projects Brighton Ltd portal.	<ol style="list-style-type: none"> 1) Membership Status, Contact Information 2) Employer Name 3) Invoicing Details 	Our legitimate interests, namely activating your account to enable access to our products and services
To perform administrative functions (e.g., account management, invoicing and support)	4. Contact Information	Our legitimate interests, namely facilitating the effective provision and administration of our products and services

NOTE: In connection with The Projects Brighton Ltd App, we process Personal Data as a processor or service provider on behalf of our customer and in accordance with our customer's instructions, including any applicable terms in the agreement with that customer.

5.3 The Projects Brighton Ltd Products and Services

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
<p>Our goal in processing your personal data is to deliver The Projects Brighton Ltd products and services, including a range of offerings such as a professional address with mail and package handling services and indoor and outdoor event spaces.</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Account Information 3) Activity & Usage 4) Other Voluntary Personal Data 	<p>The processing of your data is necessary to fulfil a contract when you sign up for our membership products and services. Moreover, we have a legitimate interest in fulfilling contracts with organisations and providing our products and services in relation to your affiliation with such organisations.</p>
<p>Additionally, we keep track of your usage of our products and services for management and reporting purposes.</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Account Information 3) Activity & Usage Information 	<p>Our monitoring activities are based on our legitimate interests as we analyse your interactions with The Projects Brighton Ltd products and services to personalise and improve them, ensure accurate reporting, and comply with relevant terms and conditions.</p>

5.4 The Projects Brighton Ltd Communications

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
<p>We process your personal data to deliver transactional communications, which include service messages, invoices, receipts, registration emails, security alerts, updated terms and policy changes, booking confirmations, and other non-marketing communications.</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Account Information 	<p>Our legitimate interests revolve around administering our business efficiently and effectively, and processing your data enables us to fulfil these operational needs.</p>
<p>Additionally, we may create and send you marketing, sales, promotional, and other non-transactional communications about The Projects Brighton Ltd products and services, as well as offerings from our Licensees and partners. These communications may encompass newsletters, promotions, news, SMS or push notifications, and event invitations.</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Event Information 	<p>We rely on our legitimate interests to promote The Projects Brighton Ltd's products, services, and events (including those of our partners) that we believe may be of interest to you. In certain cases, we will seek your consent before sending such communications.</p>
<p>To maintain quality, ensure compliance, and for internal training purposes, we may record phone or video calls (in accordance with the law) or retain transcripts of dialogue.</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Other Voluntary Personal Data 	<p>Our legitimate interests include upholding the quality of our interactions with current and potential members and customers. In specific situations, we will seek your consent (if required under applicable law) before recording calls or keeping transcripts.</p>
<p>We also process your personal data to address your inquiries, comments, and provide information you request when you contact us through various means, such as email, phone, chat, in-app support, or web forms (e.g., "Contact Us").</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Other Voluntary Personal Data 	<p>Our legitimate interests encompass fulfilling your requests and ensuring effective communication with you.</p>

5.5 Third-Party Add-Ons, Integrations and Services

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
<p>We process your personal data to fulfil your request for accessing third-party products and services, add-ons, features, and functionality in connection with your membership. This may include services like IT support, insurance, and other technology-related services.</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Account Information 	<p>The processing is necessary to perform a contract with you, especially when you have contracted for your own membership products and services. Moreover, we have legitimate interests in fulfilling contracts with your employer, educational institution, or other organisation, particularly if your membership account is associated with their contract for membership products and services. Additionally, your employer, educational institution, or other organisation has a legitimate interest in providing you with additional services that enhance your membership.</p>
<p>We also process your personal data to facilitate the booking and reservation of third-party office spaces through The Projects Brighton Ltd's software and technology platform and applications.</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Account Information 	<p>The processing is necessary to perform a contract with you, particularly if you have contracted for your own membership products and services. Moreover, we have legitimate interests in fulfilling contracts with your employer, educational institution, or other organisation, particularly if your membership account is associated with their contract for membership products and services. Additionally, your employer, educational institution, or other organisation has a legitimate interest in offering you a convenient way to book and reserve third-party office spaces using a single platform and/or application.</p>

5.6 Events Programme

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
<p>We process your personal data to manage attendance for events that we organise, host, and/or co-host at our locations.</p>	<p>1) Event Information</p>	<p>Compliance with a legal obligation concerning health and safety</p>
<p>We also process your personal data to manage registrations and participation in events and virtual events that we organise, host, and/or co-host. This includes sending you related communications and, where applicable, sharing your registration information with third-party organisers and co-sponsors.</p>	<p>1) Event Information</p>	<p>Our legitimate interests include planning and hosting (or co-planning and co-hosting, as applicable) events and webinars for which you have registered or that you attend.</p>
<p>Moreover, we may photograph and record events and webinars to develop event and webinar-related content and promotional materials and provide you with the ability to rewatch event and webinar-related content.</p>	<p>1) Event Information</p>	<p>Our legitimate interests encompass creating event and virtual event-related content and promotional materials and offering the opportunity for you to review event and webinar-related content at a later time. As per our Projects Photography policy, members are automatically opted-in however can opt-out at any time.</p>

5.7 Websites and Social Media Pages

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
<p>We process your personal data to operate and administer our websites (including our social media pages) and to provide you with the content you access and request.</p>	<p>1) Device, Internet & Network Activity Information</p>	<p>Our legitimate interests involve providing online content to our customers and prospective customers, offering details about our service offerings and related information.</p>
<p>Additionally, we analyse website usage patterns to optimise the relevance and performance of our website and enhance the user experience for our website visitors.</p>	<p>1) Device, Internet & Network Activity Information</p>	<p>Our legitimate interests include delivering a relevant and well-functioning website, ensuring our website visitors have a favourable experience.</p>
<p>We may conduct market research, advertise to you, and provide personalised information about us both on and off our websites, as well as personalised content based on your activities and interests.</p>	<p>1) Device, Internet & Network Activity Information</p>	<p>Our legitimate interests encompass advertising our products and services to potential customers. In some cases, if required by applicable law, we will obtain your consent for personalised advertising.</p>
<p>Moreover, we track website usage to verify accounts and activities, enhancing our efforts to maintain website security.</p>	<p>1) Device, Internet & Network Activity Information</p>	<p>Our legitimate interests involve safeguarding against website misuse or abuse, promoting website safety and security, and protecting the rights of ourselves and others.</p>

<p>We process your personal data to facilitate your requests for additional information or marketing communications, such as when you check a box or fill out web forms labelled as "Contact Us."</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Other Voluntary Personal Data 3) Device, Internet & Network Activity Information 	<p>Our legitimate interests encompass promoting our (and our partners') products, services, and events that we believe may be of interest to you.</p> <p>In certain circumstances we will obtain your consent for marketing communications.</p>
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PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
<p>We process your personal data to enable your physical access to our locations and/or Licensees' locations when you provide on-site services. This involves activating your keycard or mobile key (where available).</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Account Information 3) Supplemental ID Information 	<p>The processing is driven by our legitimate interests in facilitating seamless access to our locations to support your service provision.</p>

<p>Additionally, we manage and monitor your access to our workspaces and buildings, including recording the date and time of arrival associated with your keycard or mobile key, when you provide on-site services.</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Account Information 3) Security Information 	<p>We have legitimate interests in prioritising the safety and security of our offices, employees, members, and guests. Furthermore, we process this data to fulfil contractual obligations with landlords, building owners, and managers, necessitating the collection and provision of data for access and security at the base building controls where our workspaces are situated.</p>
<p>Moreover, we track, manage, and report on your service activity. In some cases, we may share this information with your employer or contractor, particularly if you are associated with our vendor.</p>	<ol style="list-style-type: none"> 1) Contact Information 	<p>The processing is grounded in our legitimate interests to efficiently manage our business operations, evaluate the quality of services provided and ensure adherence to the terms and conditions of our service contracts.</p>

5.9 Other Data Processing Activities

PURPOSE FOR PROCESSING YOUR PERSONAL DATA	CATEGORY OF PERSONAL DATA	LEGAL BASIS (WHERE REQUIRED)
<p>We process your personal data to verify your identity for fraud prevention and compliance with anti-money laundering, anti-corruption and anti-bribery regulations. This involves utilising Contact Information and Supplemental Identification.</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Supplemental Identification 	<p>Our legitimate interests include preventing fraud and unauthorised use of our products and services, particularly for fraud prevention. Additionally, we process your data to comply with legal obligations concerning anti-money laundering, criminal financing legislation and anti-corruption and anti-bribery regulations.</p>
<p>Moreover, we process your personal data to manage payments necessary to complete transactions, including service retainers. This processing includes Contact Information and Payment Information.</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Payment Information 	<p>The processing is based on performing a contract with you, especially if you contract for your own products and services.</p> <p>Additionally, we have legitimate interests in invoicing for our products and services and managing customer accounts.</p>

<p>We create internal reports and models (e.g., utilisation, forecasting, revenue, financial, capacity planning and management, product and services strategy) to manage our business operations effectively. This processing involves Contact Information, Account Information, Payment Information, Activity & Usage Information, and Vehicle Information.</p>	<ol style="list-style-type: none"> 1) Contact Information 2) Account Information 3) Payment Information 4) Activity & Usage Information 5) Vehicle Information 	<p>The processing is grounded in our legitimate interests, which include managing our business operations, enhancing our products and services and fulfilling our obligations related to financial reporting.</p>
<p>Additionally, we process your personal data to optimise the performance and functionality of our products and services, which includes Contact Information, Account Information, Activity & Usage Information, and Device, Internet & Network Activity Information.</p>	<ol style="list-style-type: none"> 1. Contact Information 2. Account Information 3. Activity & Usage Information 4. Device, Internet & Network Activity Information 	<p>The processing is based on our legitimate interests in ensuring that our products and services meet customer expectations and provide innovative solutions tailored to our customers' evolving business needs.</p>
<p>We use Activity & Usage Information and Security Information to measure occupancy levels at our locations and comply with health and safety obligations</p>	<ol style="list-style-type: none"> 1) Activity & Usage Information 2) Security Information 	<p>The processing is carried out to comply with a legal obligation concerning health and safety, including fire safety codes.</p> <p>Additionally, we have legitimate interests in measuring occupancy levels to ensure the safety of our employees, members and guests.</p>

<p>Moreover, we use Contact Information, Account Information, and Device, Internet & Network Activity Information to determine your geographic location, enabling us to provide location-based services.</p>	<ol style="list-style-type: none"> 1. Contact Information 2. Account Information 3. Device, Internet & Network Activity Information 	<p>We process your data based on our legitimate interests in enhancing and personalising our products and services according to your location.</p>
<p>To ensure the safety and security of our offices, employees, members and guests, we monitor our locations using CCTV.</p>	<ol style="list-style-type: none"> 1. Security Information 	<p>The processing is carried out to meet our legitimate interests in safeguarding our premises and protecting the safety and security of our offices, employees, members and guests.</p>
<p>We conduct research and innovation activities, which may include sending customer experience surveys and market research surveys on topics related to our products and services. This processing involves Contact Information, Account Information and Other Voluntary Personal Data.</p>	<ol style="list-style-type: none"> 1. Contact Information 2. Account Information 3. Other Voluntary Personal Data 	<p>The processing is based on our legitimate interests in improving and enhancing our products and services by gathering information through surveys.</p>
<p>Furthermore, we administer promotions and contests, and this may involve processing Contact Information, Account Information and Other Voluntary Personal Data.</p>	<ol style="list-style-type: none"> 1. Contact Information 2. Account Information 3. Other Voluntary Personal Data 	<p>We process your data based on our legitimate interests in providing opportunities for participation in promotions and contests that may be of interest to you.</p>

6. HOW WE SHARE YOUR PERSONAL DATA

We consider safeguarding your Personal Data as a crucial aspect of our relationship with you; thus, we do not disclose your Personal Data to third parties for sale. However, there are specific situations where we may share, transfer, or disclose your Personal Data to certain third parties ("Third Parties") as described below:

Advertising Partners:

As is common practice among companies operating online, we may share limited Personal Data with non-affiliated business partners, advertising networks, analytics providers and other advertising providers ("Advertising Partners") for the purpose of targeting advertisements on non-The Projects Brighton Ltd websites, applications, and services. Additionally, we may allow certain Advertising Partners to collect limited information from our websites and services using cookies, web beacons and other technologies to tailor online advertisements to your interests and preferences.

Professional Advisors:

We may share your Personal Data with our professional advisors, including lawyers, bankers, auditors and insurers who provide consultancy, legal, banking, auditing, insurance and accounting services to us.

Add-On and Integration Partners:

Through our platform and applications, we may offer integration with non-affiliated third parties ("Add-On Partners") providing additional features, functionality, applications, products or services. If you integrate with or access these Add-Ons, we may share your Personal Data with the associated Add-On Partner to enable your access or use of the Add-Ons.

Organisers, Hosts, and Sponsors:

When you register for, attend, or participate in events we may share your Personal Data with them.

Our Landlords and Building Owners and Managers:

We may share your Personal Data with landlords and building owners and managers as required by our lease and/or management agreements to facilitate access and security at the base building controls where our workspaces are located.

Our Partners (in Connection with your Membership):

Where permitted by law, we may share your Personal Data with select partners that offer products and services related to your membership. For example, we may share your basic Contact Information with specific insurance providers who may contact you to provide products and services to meet your contractual insurance requirements. Where required by applicable law, we will only share your Personal Data with your consent. Our partners are bound by a contractual obligation to process Personal Data only as necessary to offer products and services related to your membership.

Third Parties Involved in Business Transactions:

In the context of business transactions such as mergers, acquisitions, sales or reorganisations, your Personal Data may be shared or transferred (subject to standard confidentiality arrangements)

Other Third-Party Disclosures:

We may share your Personal Data (i) at your direction or with your consent, (ii) if required by law, (iii) to protect our rights, interests, or property, (iv) to prevent or investigate wrongdoing, (v) to enforce our terms and conditions, policies and agreements or (vi) to protect personal safety or against legal liability.

11.7 Precise Location-Based Services

With your explicit consent, we have the option to collect approximate physical location data from your device utilising a range of technologies, including GPS, Bluetooth, cell phone tower locations, Wi-Fi signals and others. This data collection is aimed at enhancing your experience by providing and enabling location-based services. You hold the control to grant consent through The Projects Brighton Ltd Apps or other designated programs during your initial login or at a later time.

Once you decide to share your location, The Projects Brighton Ltd App or other programs will gain access to your location data based on the preferences you have chosen. To manage location sharing, you can conveniently adjust settings through your device's operating system (e.g., via the "Settings" icon). Your choices include sharing your location data at all times, only when the App is in use or opting out entirely.

If you select the "only when the App is in use" option, The Projects Brighton Ltd will access your location data while the App is active and data collection will cease when you log off or close the application. For further control, you can utilise your phone's or device's settings to disable location capabilities for The Projects Brighton Ltd App or other relevant programs.

12. CHILDREN AND PERSONAL DATA

At The Projects Brighton Ltd, we prioritise the privacy and protection of children. Therefore, our products and services are not designed for use by children. We do not knowingly collect Personal Data from individuals under the age of 18 unless we have obtained explicit consent from a parent or legal guardian.

If you are a parent or legal guardian and suspect that your child has provided us with Personal Data without your consent please reach out to us at hello@projectsclub.co.uk.

13. CHANGES TO THIS POLICY

From time to time, The Projects Brighton Ltd may update or modify this Privacy Policy, at its sole discretion, to reflect changes in legal and regulatory requirements, as well as evolving business practices. The revised Policy will be published at www.projectsclub.co.uk along with a revised "Last Updated" date (located at the top of this Policy). We encourage you to visit this page periodically to stay informed, particularly before providing any Personal Data.

In situations where we make updates or modifications to this Policy that significantly impact your privacy rights, we will provide additional notice which could include sending an email or displaying in-service notifications.

The updated Privacy Policy will be effective immediately upon posting or as otherwise communicated by us. By maintaining your relationship with us or continuing to use our website, products or services after any such updates take effect, you acknowledge and (as applicable) accept the modified Privacy Policy. We value your privacy and are committed to safeguarding your personal information according to the latest policies and practices.

14. CONTACTING US

If you have any questions or concerns regarding this Privacy Policy or any privacy related matters, please feel free to contact The Projects Brighton Ltd at hello@projectsclub.co.uk or by sending a letter to the address provided below:

Projects Beach
8-9 Ship Street
Brighton
BN1 1AD

As a responsible organisation, The Projects Brighton Ltd adheres to data protection laws. For more details about this, please send an email to hello@projectsclub.co.uk

We are dedicated to working with you to resolve any complaints or concerns about privacy in a fair manner. If, for any reason, you believe that we have not been able to address your complaint or concern satisfactorily and you are located in the European Economic Area or the United Kingdom, you have the right to lodge a complaint with the competent supervisory authority.