

Last updated: August 11, 2020

## PRIVACY POLICY

Uniland Cowork, LLC d/b/a HANSA (“HANSA”, “we”, “us”) respects your privacy and has instituted this Privacy Policy to protect you (the “User”).

This Privacy Policy applies to any website or application provided by HANSA, unless stated otherwise. “Services” shall mean the provision, maintenance, and operation of HANSA’s website and all services attendant thereto that are under direct HANSA control. This Privacy Policy governs your use of the Services.

Capitalized terms are defined herein.

HANSA offers shared and private office space in a modern coworking environment to individuals and organizations on a monthly basis. Any individual, organization, employee, or affiliate that successfully creates a member account with HANSA, or is a guest of such member, shall be considered a “User(s)” of our Services for purposes of this Privacy Policy.

If you have any questions about our Privacy Policy, please contact the HANSA team by navigating to <https://www.HANSAworkspace.com/> and completing our “Contact Us” form.

This Privacy Policy is effective as of July 14, 2020.

### A. YOUR RIGHTS UNDER THIS POLICY

The following rights are intended to mirror those provided under the General Data Protection Regulation (“GDPR”). Accordingly, these rights are coterminous with those provided in GDPR, and HANSA does not grant any right in excess of those provided thereunder or in excess of the jurisdiction of the GDPR. You may exercise any of the following rights by navigating to <https://www.HANSAworkspace.com/> and completing our “Contact Us” form.

#### 1. The Right of Access

You have the right to access and obtain certain data we collect from you, such as your “Personal Data”, which shall mean any information that can be used to identify and contact you. Accordingly, upon request, we will provide you with a copy of the data we have collected from you within one (1) month of our receipt of your request. If we receive complex or significant numbers of requests from users seeking copies of their data, we will have up to two (2) months to respond to a request. We reserve the right to charge a reasonable fee for repetitive requests or further copies.

Our lawful basis under the GDPR for collecting Personal Data is either (i) in fulfillment of contract, with respect to any data we collect pursuant to contracts with customers; (ii) pursuant to the User’s consent, with respect to any data that we collect from persons that is outside the terms of a customer contract; or (iii) our legitimate interest of maintaining and improving our service, with respect to any data that we collect only for our internal use. Our bases for processing your Personal Data and any other information in this manner under the GDPR are our legitimate interests of marketing our Services, fraud prevention, and information technology security.

## **2. The Right of Rectification**

You have the right to rectify any inaccurate or incomplete Personal Data that we have collected from you. If you believe any data that we have about you is incorrect, you can request rectification by contacting customer support at the email address identified in this Privacy Policy and identifying what information you believe to be incorrect. We agree to correct any such inaccurate or incomplete Personal Data. We reserve the right to request supporting evidence, and the right to not rectify any information that we reasonably believe to be correct.

## **3. The Right to Deletion**

You have the right to have HANSA erase all of the Personal Data we have collected from you under the following circumstances:

- i. The Personal Data is no longer needed for its original purpose and no new lawful purpose exists;
- ii. The lawful basis for the processing is subject to your consent, and you have since withdrawn consent, and no other lawful ground exists;
- iii. You have exercised your right to object, and we have no overriding grounds for continued processing of that Personal Data;
- iv. The Personal Data was processed unlawfully; or
- v. Deletion is otherwise necessary to comply with European Union law or regulations.

## **4. The Right to Restrict Data Processing**

You have the right to restrict our processing of your Personal Data under the following circumstances:

- i. You contest the accuracy of your Personal Data;
- ii. The processing of your Personal Data was unlawful;
- iii. We no longer need your Personal Data for our original purpose, but we still require that Personal Data to establish, exercise, or defend our legal rights; or
- iv. Verification of overriding grounds is pending, as in the context of a user's erasure request.

## **5. The Right to Be Notified**

You have the right to be notified about how we collect data about you, to whom we disclose such data, and how we use such data.

Should you exercise your rights of rectification, erasure, or cessation of processing, we are required to notify any relevant third party that you have exercised these rights unless doing so would be impossible for us or require disproportionate effort.

## **6. The Right of Portability**

Your right of portability permits you to:

- i. Receive a copy of your Personal Data in a commonly used, machine-readable format;
- ii. Transfer your Personal Data from HANSA to a third party;
- iii. Store your Personal Data for your further use on a private device; or
- iv. Have your Personal Data transmitted from HANSA to a third party.

We are not required to retain Personal Data for longer than otherwise necessary in order to comply with this right of portability.

## **7. The Right to Object to Processing**

If HANSA denies your request that we cease processing your Personal Data, you have the right to object on grounds relating to your particular circumstances. We must grant your request to cease processing your Personal Data unless:

- i. We can demonstrate compelling, legitimate grounds for processing your Personal Data which override your interests, rights, and freedoms; or
- ii. We require the Personal Data to establish, exercise, or defend our legal rights.

You also have the right to object to processing of your Personal Data for direct marketing purposes or scientific, historical, or statistical purposes.

## **8. The Right to Reject Automated Individual Decision-Making**

You have the right to reject automated processing of your Personal Data to make decisions about you—for example, profiling—if such processing produces a legal effect that significantly affects you. This processing shall be permitted if it is necessary for performance of the contact, is authorized by law, or you have explicitly consented to this use and appropriate safeguards are in place.

## **B. WHEN AND HOW DOES HANSA COLLECT PERSONAL DATA?**

### **1. Registration**

At the time you create your member account, we will ask for certain Personal Data including, but not limited to, your full name, mobile telephone number, and email address.

During registration, you may opt to provide additional information about yourself—such as your gender or age—but you are not required to do so.

When you create a member account, we ask for your honest responses to our questions concerning your Personal Data. By continuing to use the Services, you represent and warrant that the information you provided us is correct and accurate.

### **2. Collection of Personal Data**

Notwithstanding the Personal Data you provide HANSA when you create a member account, HANSA does not collect any additional Personal Data from its users.

### **3. Sharing of Personal Data**

We will not sell or rent your Personal Data to any third party.

### **4. Use of Personal Data**

We use your Personal Data to manage your member account and to deliver the Services. HANSA reserves the right to collect and use certain data collected from users, in the aggregate only, to diagnose problems with the Services, to improve the Services, or to resolve technical issues. We shall take all commercially reasonable steps to ensure that Personal Data is used only for its intended use.

### **5. User Activity**

We collect certain data with respect to your use of the Services. Such data is non-personally identifiable information and is not considered Personal Data.

Except as otherwise provided by applicable contracts with HANSA users or third parties, we are free to disclose and use such non-personally identifiable data.

Should you contact us with an inquiry, we will use the information you provided us to respond but will not share such information with any third party.

We reserve the right to contact you by email to notify you of specials, new services, or changes to this privacy policy. You will have the option to unsubscribe from such emails.

Last updated: August 11, 2020

Unless otherwise specified, the only User data we store is (i) Users' names and (ii) Users' email addresses. Such data will be stored securely on servers located in the United States or in the cloud using Microsoft or similar service.

## **C. USE OF COOKIES**

### **1. By HANSA**

We use cookies in order to improve your experience while you navigate through our website. The cookies that are categorized as necessary are stored on your browser as they are essential for the working of basic functionalities of the website. We also use third-party cookies that help us analyze and understand how you use this website. These cookies will be stored in your browser only with your consent. You also have the option to opt-out of these cookies. Opting out of some of these cookies may have an effect on your browsing experience.

Should you decide that you want to limit HANSA's use of cookies when you use our Services, please contact us by navigating to <https://www.hansaworkspace.com/> and completing the "Contact Us" form.

### **2. "Do Not Track" Signals**

In your web browser settings, you can opt to send a "Do Not Track" signal to the HANSA website requesting that we do not track your activity on our website. Upon receipt of this signal, we shall cease our use of any tracking cookies within forty-eight (48) hours.

Please note, however, that HANSA business partners or affiliates may use cookies in connection with our website. HANSA make no warranties regarding how such business partners or affiliates respond to "Do Not Track" signals.

## **D. SECURITY**

We value your trust in providing us with your information and strive to use commercially acceptable means of protecting it. However, we caution that no method of transmission over the internet or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

All Personal Data and other sensitive data we collect from users—such as credit card information—is encrypted and securely transmitted.

In the event that we experience any security breach, we will notify you within the first seventy-two (72) hours that we become aware of the breach. We will contact you by telephone and/or by email and provide as much relevant information to you as possible, including the nature of the breach and an estimate of the number of users affected. This communication will include our contact information for users seeking additional customer support or technical assistance.

Last updated: August 11, 2020

#### **E. CONSENT TO PRIVACY POLICY**

By accessing or using the Services, you hereby agree to comply with and be bound by the Privacy Policy as detailed herein.

We reserve the right, in our sole discretion, to modify this Privacy Policy from time to time without notice. The amended Privacy Policy shall automatically be effective five (5) days after it is posted to the HANSA website. Your continued use of the services after the effective date of any posted change constitutes your acceptance of the amended Privacy Policy as modified by the posted changes.