

THE FISHERIES

Privacy & Cookies Policy

Last updated: 23 October 2020

This is the Privacy Policy (the '**Policy**') of Fisheries London Ltd ('**The Fisheries**', and '**we**', '**our**', '**us**'). This Policy describes the ways in which The Fisheries collects and uses information about you when you visit The Fisheries' website at www.thefisheries.london (the '**Website**') or one of our co-working spaces, or when you contact us by phone, via one of our social channels, by letter or email (for example to enquire about our services or working with us, to apply for a job or make a complaint to The Fisheries).

The Fisheries may change this Policy at any time and when this happens we will notify you of any changes to this Policy by noting this on our Website and/or with appropriate signage in our spaces. The changes will apply after we have notified you. If you do not wish to accept the new Policy you should stop using the Website or using our spaces and services (as applicable). If you continue to use the Website and/or our spaces and services after the changes, your continued use of the Website and/or our spaces and services shows us your agreement to be bound by the new Policy.

For the purposes of data protection legislation, The Fisheries is the controller for the processing of your personal data. The Fisheries has notified the Information Commissioner's Office ("**ICO**") of its processing of personal data. The notification indicates what data is processed by The Fisheries and for what purpose, and to which persons or entities the data will be provided.

If you have any queries about this Policy, please contact The Fisheries using the contact details set out at paragraph 12 below.

1 - WHAT PERSONAL DATA IS AND WHO THIS POLICY APPLIES TO

Personal Data means information that identifies, relates to, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular person or household, including identifiers such as a real name, alias, a device identification number, location data, an online identifier, commercial information (including services purchased), or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, or as further defined under the General Data Protection Regulation ("**GDPR**"). We indicate in this Policy the information we collect from you.

By contacting us, visiting the Website or a space of ours you are agreeing to be bound by this Policy in respect of the information collected about you. Fisheries may change this Policy at any time. The Fisheries shall deem your continued access of the Website or a space of ours and use of our services as indicating your consent to such changes. This Policy applies to the following people:

- A.** visitors to the Website (including the member portal);
- B.** members, guests and other people who visit our spaces; and
- C.** people who contact us by phone, via one of our social channels, by letter or email (including to enquire about our services or working with us, apply for a job or make a complaint).

2 - THE INFORMATION WE COLLECT AND HOW WE COLLECT IT

A. Visitors to the Website

The Website is both a brochure for The Fisheries (its spaces, services and opportunities to work with and for us) and, in the member portal, a hub for our members. The Website collects information from you in the following ways:

- i.** We use cookies for the limited purposes set out in TABLE ONE below to collect certain information when you submit an enquiry or book a tour via the Website. The

Fisheries relies on consent to collect this information via you clicking to agree to such cookies being placed when you first visit the Website or otherwise changing the cookie settings so that such cookies are not placed.

ii. Should you choose to contact The Fisheries via the Website, The Fisheries will collect your name, e-mail address, telephone number together with any other information that you submit in connection with such contact request ("**Contact Data**"). The Fisheries relies on consent to collect this information because you choose whether to contact The Fisheries or not and can choose how much personal information to provide to The Fisheries in doing so.

iii. If you speculatively submit your CV and/or other personal data in seeking to work with or for Fisheries, we may use the information you provide to us to assess you as a candidate, including (at our discretion) to undertake criminal record checks and/or checks with references ("**Recruitment Data**"). We may hold such information for twelve (12) months after receipt, after which it shall be destroyed or deleted without further notice unless we reasonably consider that you may be a good candidate for a future role in which case we may hold such information (including personal data) for so long as is reasonable in the context. The Fisheries may retain anonymised statistical information about applicants to help inform The Fisheries' recruitment activities in the future. The Fisheries relies on either: (i) compliance with a legal obligation; or (ii) the legitimate interests processing grounds in order to collect the information set out in this paragraph. Where legitimate interests are relied upon, it is in The Fisheries' legitimate interests to collect such items of personal data because this is necessary in order to carry out certain specific employment related duties relating to employment applications. The items of personal data collected are not of a nature whereby your rights and freedoms as a data subject are outweighed by such data collection.

iv. Any information that you elect to disclose in your user profile in the member portal on the website. The Fisheries relies on consent to collect this information because you choose whether and how much personal information to disclose.

v. Any content you generate on our upload to the Website or generate, upload or make available through our digital channels, including preferences you set (such as choice of language), photographs and videos you upload, conversations and connections you have with other users and comments you make via our online message boards. The Fisheries relies on consent to collect this information because you choose whether to generate and/or upload such content.

B. Members, guests and other people who visit our spaces

The Fisheries will collect the following information from you when you visit a space:

i. Membership application. The details you provide when submitting a membership application. This may include your name, address, email address, business address and phone number, gender and date of birth, nationality, a photograph of yourself, information about your work and other information that you elect to provide to support your application ("**Member Data**"). We may, if you so elect, collect information about your debit/credit card and bank account information provided by you to our payment service providers. In this case we use this information for the purpose of recording and processing your membership application, and administering your membership ("**Payment Data**"). It is not mandatory for you to submit Payment Data for us to store. Further information about how we use your Payment Data please refer to paragraph 4 below.

ii. Member access. Once you are a member you will use third party software downloaded on your smartphone to access one of our spaces, and we will have access to information about your movement in and out of the space ("**Access Data**").

iii. Member services. We also use third party technologies, which will collect and store certain personal data including your name and/or email address in order to provide IT and printing services.

iv. Guest information. The details you provide when you visit one of our spaces as a guest, such as first and last name, email address, contact telephone number ("Contact Data").

v. Should you request to receive marketing communications from The Fisheries, we will collect your name and email address ("Marketing Data").

vi. CCTV footage. We use CCTV cameras in our buildings for the safety and security of our employees, our members (and their employees and guests) and our buildings and contents ("Surveillance Data"). Recordings are used for the prevention of crime, including the provision to enforcement agencies of evidence of criminal activity for formal actions and identification.

C. People who contact The Fisheries by email

When you send an email to The Fisheries we will handle your personal data according to the reason for your email.

For general enquiries, enquiries about working with/for The Fisheries, job applications, or complaints by email, we will file any relevant document and may retain your details for a maximum of six (6) years following receipt in a secure environment and access to it will be restricted on a 'need to know' basis.

The Fisheries relies on the legitimate interests processing ground to collect the information set out in this paragraph. It is in The Fisheries' legitimate interests to collect the personal data referred to here because this is necessary in order to review, consider and respond to your enquiry, application or complaint (as appropriate).

The items of personal data collected are not of a nature whereby your rights and freedoms as a data subject are outweighed by such data collection.

3 - WHAT IF THE FISHERIES CANNOT COLLECT THIS INFORMATION

You can use your browser settings to prevent us collecting certain of the above information about you. If you still have concerns about the information we collect please contact us at any time by sending an e-mail to hello@thefisheries.london.

4 - PAYMENT INFORMATION

Any credit or debit card payments you make through our Website will be processed by our third-party payment providers, which securely store and encrypt all associated Payment Data at industry standards.

The Fisheries may temporarily store Payment Data you submit for the purpose of processing the related payment. With regard to membership applications, if you are put on to a membership waiting list, please note that we may store this Payment Data for later use to initiate your membership.

For members, The Fisheries may store and use Payment Data for the purpose of processing future payments for additional services under such membership. The Fisheries will store this data in accordance with its legal obligations under applicable law, and only for so long as legally permitted.

You may choose to opt out of us holding your Payment Data as described above, although this means that you will need to re-supply us with your card details to pay a membership fee or for any other purchases.

5 - HOW THE FISHERIES USES THE INFORMATION IT COLLECTS

The Fisheries will use the information it collects as set out in paragraph 2 above to:

- A.** in relation to the Member Data, provide each member with our membership services;
- B.** in relation to the Payment Data, complete your transactions;
- C.** in relation to the Contact Data, respond to enquires;
- D.** in relation to the Member Data and Contact Data, monitor capacity and to comply with government guidelines, regulations and mandates (for example, for COVID-19);
- E.** in relation to the Marketing Data, provide information about The Fisheries, our spaces, promotional offers, social events and other services or opportunities which The Fisheries thinks may be of interest to you. You can opt out of receiving these communications at any time by sending an e-mail to hello@thefisheries.london;
- F.** in relation to Surveillance Data, monitor for crime prevention purposes; and
- G.** share with third parties for the purposes as described in paragraph 7 below.

6 - GROUNDS FOR PROCESSING

The Fisheries relies on the legitimate interests or consent (as appropriate) processing ground to collect the information set out in paragraph 2 and use it for the purposes set out in paragraph 5.

It is in The Fisheries' legitimate interests to collect the other items of personal data listed above because this is necessary in order to provide and improve the Website (including member portal) and member services that are offered to you. Save for the Surveillance Data, the items of personal data collected are, in being limited to "business card" and "technical" type data, not of a nature whereby your rights and freedoms as a data subject are outweighed by such data collection. It is in The Fisheries' legitimate interests to collect the Surveillance Data in order to safeguard our members, guests, space and property from crime.

7 - SHARING INFORMATION WITH THIRD PARTIES

The Fisheries will not pass your information to third parties other than as described in this paragraph. We may, subject to our obligations to comply with applicable data protection legislation, share your information with third parties including:

- A.** our service providers that use and store the personal data we collect as further described in Table Two;
- B.** in relation to the sale of some or all of The Fisheries' business, or its assets, to any third party, or as part of any business restructuring or reorganisation, but we will take steps with the aim of ensuring that your privacy rights continue to be protected;
- C.** with our group companies in order to assist and facilitate the services provided to you;
- D.** with law enforcement agencies in compliance with law enforcement.

8 - THIRD PARTY COOKIES

Third Party advertisers may place or read cookies on your browser or device on the Website.

Further links to third party cookies are set out in Table One below.

9 - LINKS TO THIRD PARTY WEBSITES

The Fisheries cannot be responsible for the privacy policies and practices of other websites even if you access them using links from the Website including adverts on the Website.

The Fisheries recommends that you check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

In addition, if you link to the Website from a third party site, The Fisheries cannot be responsible for the privacy policies and practices of the owners or operators of that third party site and recommends that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

10 - SECURITY, STORAGE AND DATA RETENTION

The Fisheries has implemented technology and policies to safeguard your privacy from unauthorised access and improper use.

The Fisheries relies on the servers of its technology suppliers for data storage. These are operated by third party cloud service providers and are located worldwide including in the EEA, USA and Asia, as detailed further in the respective privacy policies linked to in Table Two. Our agreements with such suppliers contain appropriate protections in connection with any transfer of your personal information outside the EEA.

The Fisheries' policy on data retention policy is to not retain any personal data for longer than is reasonable in line with the purposes for which it was originally collected.

11 - THE FISHERIES' POLICY TOWARDS CHILDREN

The Fisheries does not knowingly collect personally identifiable information in relation to children. If The Fisheries discovers it has collected personal data in relation to anyone under the age of 18, The Fisheries shall take reasonable steps to delete such information.

12 - CONTACT DETAILS

If at any time you would like to contact The Fisheries about your views on this Policy or any enquiry relating to your personal information, including but not limited to your rights under the GDPR, you can do so by sending an e-mail to us at hello@thefisheries.london or write to us at Data Protection, The Fisheries, 1 Mentmore Terrace, London E8 3PN. This is our trading address.

You may also write to our registered address at Cambridge House, 16 High Street, Saffron Walden, Essex CB10 1AX. We are a company incorporated in England and Wales with company number 11883728.

You also have the right to make a complaint to the ICO by contacting [them](#) at any time.

13 - EXERCISING YOUR RIGHTS

You can contact us using the details set out in paragraph 12 above if you wish to:

- (i) access a copy of the personal data that we hold about you including what categories of personal data we have collected or sold about you; the categories of sources from which the personal data is collected by us; the business or commercial purpose for collecting or disclosing the personal data; the categories of third parties with whom we share your personal data; and the specific pieces of personal data that we have collected about you);
- (ii) correct any items of personal data that we hold about you;
- (iii) have any items of personal data that we hold about you erased or object to our processing of such items of personal data.

The Fisheries may ask you to verify your identity before The Fisheries responds to such requests. You will not be discriminated against in retaliation for exercising the above rights.

14 - COOKIES

A. What are Cookies?

Cookies are small text files that are placed on your device when you visit a Website. The Fisheries' use of cookies is detailed below. Session cookies enable you to move from page to page within websites, and any information you enter will be remembered but is deleted when you close your browser after a short time. Persistent cookies allow us to remember your preferences and settings when you browse the Website in the future, in different browser sessions.

B. Disabling Cookies

The use of the cookies described above improves the functionality of the Website and your experience using it. If you do not want these cookies to be served on your device, you are able to disable them by changing the settings on your browser, or on your device. Please note that if you do decide to disable cookies you may not be able to access some of the Website, some of the features of the Website, or the Website may not function properly. By continuing to use the Website, you consent to the relevant cookies being set on your browser or device.

C. More information

To find out more about how cookies work, how to manage and delete them and to see which ones have been set please visit www.aboutcookies.org or www.allaboutcookies.org.

15 - TABLE ONE

Cookies used on the Website:

| Cookie Type | Purpose | Further Information |
|-------------|--|---|
| Zoho | Submit enquiry/book tour via the Website | https://www.zoho.com/privacy.html |

16 - TABLE TWO

Third party technology used by Fisheries:

| Technology Used | Associated Purpose | Further Information |
|-----------------|---|---|
| Zoho | Customer relationship management | https://www.zoho.com/privacy.html |
| Officernd | Business administration and membership database | https://www.officernd.com/privacy/ |
| Salto Systems | Door lock and access | https://www.saltosystems.com/en/legal/legal-data/privacy-policy/ |
| Ezeep | Printing | https://www.iubenda.com/privacy-policy/18259318 |
| Essensys | WiFi and ethernet management | https://essensys.tech/privacy-policy/ |
| iZettle | In-house card payments | https://www.izettle.com/gb/legal/privacy-policy |
| Stripe | Online credit and debit card payments | https://stripe.com/en-gb/privacy |
| GoCardless | Direct debit payments | https://gocardless.com/privacy/payers/ |