

PRIVACY POLICY FOR WORKLOUNGE MEMBERS AND VISITORS

1. Introduction

The purpose of this Privacy Policy (hereinafter referred to as the "Privacy Policy") is to provide transparent and clear information about the processing of personal data in connection with the operation of WorkLounge. This Privacy Policy describes the processing of personal data of WorkLounge clients and persons authorized to use WorkLounge services on the basis of a Membership Agreement (hereinafter "Members"), as well as the processing of personal data of mere visitors of WorkLounge ("Visitors"). This Privacy Policy forms, among other things, an integral part of the Terms and Conditions of a WorkLounge membership (hereinafter "Terms and Conditions").

2. Administrator

2.1. The administrator of personal data processed in accordance with this Privacy Policy shall always be one of the following companies:

- WorkLounge s.r.o., Company ID: 05204984, with a registered office at Plzeňská 155/113, Košíře, 150 00 Praha 5;
- WorkLounge Prague s.r.o., Company ID: 06541682, with a registered office at Plzeňská 155/113, Košíře, 150 00 Praha 5;

(the "WorkLounge Companies"). The administrator will usually be the one with which a Membership Agreement or other agreement has been concluded that entitles the Member to use WorkLounge Services, provided that in some cases data may be processed by other WorkLounge Companies as joint administrators.

2.2. The administrator of personal data of Visitors is always the WorkLounge Company, which operates the visited premises (WorkLounge s.r.o. - Forum Karlín, WorkLounge Prague s.r.o. - Diamant Wenceslas Square).

3. Members

Members' personal data may be processed for the purposes set out below. The scope of the processed data and the legal bases of the processing may differ depending on whether the Member him or herself has signed a membership agreement or is only drawing rights from it (i.e., an employee of a member company). Information regarding the processing of Members' data shall apply mutatis mutandis to the processing of data of WorkLounge clients, who conclude a membership agreement but are not yet Members themselves, or to the processing of data of a client's representative. There is no automated decision-making or profiling in these processes.

3.1. Provision of WorkLounge Services

This purpose includes, in particular, the processing of data in connection with the provision of WorkLounge Services that are provided on the basis of a signed membership agreement (e.g. use of common areas, offices or conference rooms, copying, printing and scanning, community activities, online member network, information service - operational communication and news, etc.), including support services, possibly also in connection with the provision of WorkLounge services on the basis of other or additional contracts (e.g. car rental, purchase of credits, etc.).

The legal basis for this processing is the negotiation of or the performance under a contract (Article 6 (1) (b) of GDPR), or the legitimate interests (Article 6 (1) (f) of GDPR) of the contracting parties in performing under the contract (if the contract has not been concluded by the Member directly). The latter legal basis also applies to the processing of personal data of potential representatives who have signed the relevant contract.

The categories of personal data concerned may be (depending, inter alia, on the type of membership or contract):

identification data (e.g. name, surname, date of birth, company ID number), **contact and address data**

(e.g. e-mail, telephone, registered business office), **data on the contract and services used** (e.g. member company, office number, balance of credits and printing units, meeting room or workspace reservations), **data on payment and payment details** (e.g. bank details, invoices, payments), **access details** (e.g. access cards / chips, passwords), **communication and interactions**, **profile data** (e.g. member profile - bio, interests), **preferences and settings**.

The source of data is usually the WorkLounge Member or Client who has entered into an agreement authorizing the Member to use WorkLounge Services. Some data may also be collected by WorkLounge's own business activities or automatically in information systems. The provision of identification data and contact and address data is mandatory for conclusion of a membership agreement, and therefore the relevant WorkLounge Services cannot be provided if this information is not provided.

The data will be processed for this purpose for the duration of the relevant contractual relationship, and subsequently some data may be further processed on the basis of WorkLounge's legitimate interests (Article 6 (1) (f) of GDPR) in the protection of rights and property (e.g. for collection of unpaid balances or in the event of litigation), up to statutory limitation periods.

In addition to the WorkLounge Company that has concluded a membership agreement with a Member (entitling him or her to use WorkLounge services), other WorkLounge Companies may also participate in the processing of data (as joint administrators) for certain sub-purposes (processing in connection with the operation of the online member network and the ability to provide Members with WorkLounge Services at all branches), using shared information systems. The legal basis for processing by other WorkLounge Companies is the legitimate interests (Article 6 (1) (f) of GDPR) of the parties in performing under the relevant contract.

3.2. Improving WorkLounge Services

This purpose includes, in particular, the possible collection and evaluation of satisfaction questionnaires, and data on interactions with the online member network and the informational messages sent. The legal basis for the processing is WorkLounge's legitimate interests (Article 6 (1) (f) of GDPR) in providing the highest quality services, with all WorkLounge Companies being joint administrators for this purpose. The categories of personal data concerned may be:

identification data (e.g. first name, last name), **contact data** (e.g. e-mail), **feedback**, **interaction data** (e.g. number of visits, impressions, time details, IP address).

The source of data is usually the Member directly, or the data is collected automatically (for which third-party tools may be used).

The data for this purpose will be processed for the time necessary to fulfill the purpose, usually not longer than 2 years from their acquisition.

3.3. Event Organization

This purpose includes, in particular, keeping records of registered Member event participants (Member guest lists), as well as other processing related to the organization of events. The legal basis for the processing is the performance under the contract (Article 6 (1) (b) of GDPR), or legitimate interests (Article 6 (1) (f) of GDPR) of WorkLounge in controlling participation of events (e.g. if a Member has been registered by a different Member).

In connection with the organization of the event, photographs or videos capturing Members may also be taken with permission (even tacitly expressed) and may subsequently be posted through WorkLounge's social media websites or accounts, based on WorkLounge's legitimate interests (Article 6 (1) (f) of GDPR) in providing information on the event, where appropriate by consent (Article 6 (1) (a) of GDPR).

Unless otherwise stated in relation to the relevant event, all WorkLounge Companies are generally joint administrators of data in relation to the sub-purposes listed above.

The categories of personal data concerned may be:

identification data (e.g. name, surname), **contact data** (e.g. e-mail), **participation related data**, **photographs or records**.

The source of this data is usually a Member directly (or another Member), or the data may be collected by WorkLounge's own activities. The provision of identification and contact data is a contractual requirement, and therefore, if this information is not provided, it is not possible to participate in the relevant event.

The data for this purpose will be processed for the time necessary to fulfill it. Photographs or videos may be published until the submission of justified objections or revocation of consent.

3.4. Protection of Property

This purpose includes, in particular, the regulation of access to WorkLounge Premises (reception, electronic access via card/chip, registration of visitors) and the operation of camera systems. The legal basis for the processing is WorkLounge's legitimate interest in protection of property (Article 6 (1) (f) of GDPR).

The categories of personal data concerned may be:

identification data (e.g. name, surname), **contact data** (e.g. e-mail), **facility access data** (entry cards / chips, date and time), **visitor data** (e.g. visitor data, date and time of visit, branch), **camera recordings**.

The source of this data is usually the Member directly, or the data is collected automatically.

The data for this purpose will be processed for the time necessary to fulfill it. Access data is stored for a maximum of 6 months, camera recordings for a maximum of 7 days.

3.5. Fulfillment of legal obligations

This purpose includes the processing of data to fulfill legal obligations – e.g. response to data breaches, reactions to the exercising of rights, etc. The legal basis for such processing is the fulfillment of WorkLounge's legal obligation (Article 6 (1) (c) of GDPR).

The categories of personal data concerned are:

identification data (e.g. name, surname), **contact data** (e.g. e-mail, telephone), **data on the contractual relationship, other data necessary to fulfill the relevant obligation**.

The source of data is usually the Member directly, or the data is collected automatically.

The data for this purpose will be processed for the time necessary to fulfill the relevant legal obligation or as directly stipulated by legal regulations.

4. Visitors

Personal data of Visitors may be processed for the purposes listed below. There is no automated decision-making or profiling in these processes.

4.1. Event organization

This purpose includes, in particular, keeping records of registered event participants (Visitor guest lists), as well as other processing related to the organization of events. The legal basis for the processing is performance under the contract (Article 6 (1) (b) of GDPR), or legitimate interests (Article 6 (1) (f) of GDPR) of WorkLounge in controlling participation of events (e.g. if a Visitor has been registered by a Member).

In connection with the organization of the event, photographs or videos capturing Visitors may also be taken with permission (even tacitly expressed) and may subsequently be posted through WorkLounge's social media websites or accounts, based on WorkLounge's legitimate interests (Article 6 (1) (f) of GDPR) in providing information on the event, where appropriate by consent (Article 6 (1) (a) of GDPR).

Unless otherwise stated in relation to the relevant event, all WorkLounge Companies are generally joint administrators of data in relation to the sub-purposes listed above.

The categories of personal data concerned may be:

identification data (e.g. name, surname), **contact data** (e.g. e-mail), **participation related data, photographs or records.**

The source of this data may be a Member (who registered the Visitor) or the Visitor directly, or the data may be collected by WorkLounge's own activities. The provision of identification and contact data is a contractual requirement, and therefore, if this information is not provided, it is not possible to participate in the relevant event.

The data for this purpose will be processed for the time necessary to fulfill it. Photographs or videos may be published until the submission of justified objections or revocation of consent.

4.2. Protection of property

This purpose includes, in particular, the regulation of access to WorkLounge Premises (reception, registration of visitors) and the operation of camera systems. The legal basis for the processing is WorkLounge's legitimate interest in the protection of property (Article 6 (1) (f) of GDPR).

The categories of personal data concerned may be:

identification data (e.g. name, surname), **contact data** (e.g. e-mail), **visitor data** (e.g. visited Member, date and time of visit, branch), **camera recordings.**

The source of this data may be the Member (who registered the Visitor) or the Visitor directly. Alternatively, the data may be collected automatically.

The data for this purpose will be processed for the time necessary to fulfill it. Access data is stored for a maximum of 6 months, camera recordings for a maximum of 7 days.

5. Joint Administration

- 5.1.** The WorkLounge Companies have entered into a joint administration agreement, which defines their individual shares of liability in relation to the fulfillment of obligations arising from GDPR, specifically in connection with the processing of personal data which is carried out jointly in accordance with this Privacy Policy.
- 5.2.** All WorkLounge Companies fulfill their information obligations as described in this Privacy Policy, assuming that WorkLounge s.r.o. is responsible for their online publication. WorkLounge s.r.o. is also responsible for the security of information systems used to share personal data between WorkLounge Companies and the contractual involvement of processors. A single e-mail address (that is specified in Article 8 of this Privacy Policy and to which all WorkLounge Companies have access) has been established to enable Members to exercise their rights. Nevertheless, Members may exercise their rights relating to joint processing of data with any of the WorkLounge Companies, including ones not specifically involved. Should WorkLounge become aware of any breach of security related to joint processing, it shall promptly notify the other WorkLounge Companies and, if necessary, notify the relevant entities concerned within the prescribed time limits and notify the necessary Authorities.

6. Recipients and transfer of data

- 6.1.** Personal data processed by WorkLounge as an administrator may be made available to persons involved in the processing strictly to an extent to which it is necessary. Examples of these may be employees of the relevant WorkLounge Company, or carefully selected processors, especially those providing accounting services, billing services, IT services (e.g. hosting, mailing, web administration, tools such as Google Workspace, etc.) and PR (e.g. social media account management).
- 6.2.** Your personal data processed by WorkLounge as an administrator may also be made available to other WorkLounge Companies, owners and administrators of the office buildings in which the WorkLounge facilities are located, and to the extent necessary also to professional advisors (e.g. lawyers) as well as to public authorities.

- 6.3.** The transfer of your data to third countries (e.g. the United States of America) can only take place to a limited extent (e.g. in connection with the use of tools such as Google Workspace), in which case appropriate guarantees are provided, usually through so-called Binding Corporate Rules or standard contractual clauses, a copy of which you may request.

7. Rights of the data subject

In relation to the processing of personal data, the data subject (here a Member or Visitor) has the following rights, provided that the conditions stipulated by legal regulations are met. The entity may exercise its rights against WorkLounge using the contact details in Article 8.

Data subjects have the following rights:

- 7.1.** The right to access personal data, i.e. the right to request confirmation of whether your data is being processed and, if so, to obtain information on the processing in question, or, if necessary, a copy of the data being processed;
- 7.2.** The right to request the correction of inaccurate or incomplete data;
- 7.3.** The right to request immediate deletion of processed data, if any valid reason according to legal regulations is provided;
- 7.4.** The right to request a temporary restriction on the processing of personal data, if any valid reason according to legal regulations is provided;
- 7.5.** The right to make an objection to the processing of data on the legal basis of legitimate interests, or possibly for purposes of direct marketing;
- 7.6.** The right to withdraw consent to the processing of personal data at any time;
- 7.7.** The right to the transferability of personal data, i.e. the right to request processed data in a structured, machine-readable format, if any valid reason according to legal regulations is provided.

8. Contact

- 8.1.** With requests for the exercise of rights or any questions regarding the processing of personal data, it is possible to contact the WorkLounge Companies at privacy@worklounge.com, or in writing at the address of their registered office. Should you have a complaint regarding the processing of personal data, you also have the right to contact the supervisory authority directly, which in this case is the Office for Personal Data Protection.