

Privacy Policy

About us

We are Plexal (City) Limited (referred to in this Privacy Policy as “we”, “us” or “our”) based at 14 East Bay Lane, The Press Centre, Here East, Queen Elizabeth Olympic Park, Stratford, London E15 2GW. We administer an innovation centre for technology companies to accelerate innovation based at Here East, Queen Elizabeth Olympic Park, Stratford, London E15 2GW (“Plexal”) and we provide various services and facilities to our members and their users of Plexal (“Services and Facilities”) and a website for visitors and our members’ users receiving our Services and Facilities available at <https://www.plexal.com/> (our “Website”), which includes our private members area which we refer to as our “Intranet”. References to “you” or “your” in this Privacy Policy means a member’s user of our Services and Facilities, or our Website, or an individual assisting us in providing our Services and Facilities, or our Website (as applicable, depending on the context). When we refer to our “Innovation Programmes” this means a programme that we may facilitate and/or host at Plexal or one of our clients’ workspaces and has the aim of enabling innovation and includes the following types of programmes: accelerator programmes; incubator programmes; intrapreneurship programmes; innovation strategy programmes; and other innovation relates programmes and activities that we facilitate.

This privacy policy (“Privacy Policy”) sets out how we collect and use your personal data and who we may share it with for the purposes of providing Services and Facilities, and our Website to you. We will be the controller of the personal data you provide to us and/or that we receive on your behalf for the purposes of providing the Services to you. This means that we decide the purposes and means of the processing of your personal data.

Please read the following carefully to understand how we will use your personal data.

What personal data do we collect?

We may collect and process one or more of the following categories of personal data about you or the company you represent (which is our member):

- **Access Card Data:** your name, the company you represent and your location;
- **CCTV Data:** visual images/footage of you at Plexal;
- **Contact Data:** your name, address, phone number and email address;
- **Correspondence Data:** the contents of the messages you send to us, or receive from us;
- **Event Attendance Data:** your name and email address;
- **Innovation Programme Application Data:** your name, email address and position at the company you represent, work experience (including name of organisation, position held at the company, length of employment and a description of the responsibilities held and your achievements), and in limited circumstances your ethnicity and gender (depending on the Innovation Programme that you are applying for). We may ask for all or some of this personal data;
- **Innovation Programme Company Data:** number of employees at the company, founding year, names of company founders, names of employees of the company, company employee positions, company employee positions and videos of company members;
- **Innovation Workshop Data:** name, phone number, email address and job title;
- **Intranet Community Group Data:** the contents of the messages you post to other users of the community group you participate in on our Intranet;
- **Intranet Directory Data:** name, email address, position at the company you represent, company name and any additional information that you include under the “about me” section of your profile;
- **Intranet Message Data:** the contents of the messages you send to, and receive from, other users of the Intranet;
- **Member Company Data:** company name and company address;
- **Member Payment Data:** bank details (including sort code and account number) of the member;

- **Member Representative Registration Data:** name, email address, photograph and company name;
- **Member Representative Contact Data:** name, email address and company name;
- **Promotional Data:** photographs of you;
- **Supplier Company Data:** one or more of the following; company name, company address, company VAT registration number, company bank details (including sort code and account number), company financial statements, company insurance details, company organisational chart, details of fraud, litigation or other legal and/or regulatory claims, product and service information, and pricing information;
- **Survey and Feedback Data:** your responses to our surveys and any feedback you provide to us;
- **Technical Data:** IP address, device data (for example, iPhone X, Samsung S9), MAC address, browser version and type, and time zone setting;
- **Third Party Source Data:** we may obtain personal data about you from third party websites such as Facebook, Twitter, Slack, Google (including YouTube), LinkedIn, other social network websites and aggregator websites, this is limited to knowing that you have clicked on one of our adverts displayed on such third party websites;
- **Testimonial Data:** your name, the company you represent, job title and the contents of your testimonial; and
- **Visitor Data:** name, email address and company name of the visitor you invite to attend Plexal.

Why do we collect personal data, what do we do with it and what is our lawful basis of processing?

We use some or all of your personal data for one or more of the following purposes:

| Purpose: | Lawful basis of processing: |
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| <i>If you use our Services and Facilities:</i> | |
| <ul style="list-style-type: none"> • if you choose to apply to join one of our Innovation Programmes (which you may hear about as a result of being contacted by one of our Innovation sponsors) you will be required to fill in a survey or other application form, which requires you to provide your Innovation Programme Application Data and the Innovation Programme Company Data to us. We require your Innovation Programme Application Data and the Innovation Programme Company Data in order for us, our Innovation Programme sponsor and our advisory board to assess your company's suitability for the Innovation Programme you have applied for, respond to you in respect of your request, and for designing and shaping the Innovation Programme you are participating in; • if you express an interest in an innovation workshop or attend an innovation workshop, we will process your Innovation Workshop Data for the purposes of keeping you up to date about our innovation workshops, or if you attend, to identify you during the innovation workshop and communicate with you in respect of such workshop; • we will use your Contact Data and Member Company Data for the administration of your membership and/or use of our Services and Facilities; • to process payments from our members, we process your Member Representative Contact Data, Member Company Data (if the | <p>We have a legitimate interest to process such personal data to review and respond to your application to join an Innovation Programme and to design and shape the Innovation Programme for you.</p> <p>We have a legitimate interest to process such personal data for the purposes of delivering our workshop to you.</p> <p>We have a legitimate interest to process such personal data to provide you with your membership as part of our obligation to the company you represent with whom we have a contract to provide the Services and Facilities.</p> <p>We have a legitimate interest to process such personal data to process payments for our Services and</p> |

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| <p>member is a company, and not a sole trader, for example) and Member Payment Data;</p> <ul style="list-style-type: none"> • when we onboard a company to use our Services and Facilities, we are required to process your Member Representative Contact Data and Member Company Data to carry out our onboarding process; • if you respond to one of our adverts on a third party website we will process your Third Party Source Data to help us to assess the effectiveness of our marketing strategies on these third party websites; • from time to time, we create promotional materials to promote our Services and Facilities, and Plexal more generally, and as part of this, we take photographs of various locations of Plexal, and activities and events undertaken at Plexal. We will process your Promotional Data where we have obtained your consent to do so. • to notify you about changes to our policies and/or our Services and Facilities we process your Contact Data; | <p>Facilities from the member you represent.</p> <p>We have a legitimate interest to process such personal data to on board the member you represent in order to provide our Services and Facilities to the member.</p> <p>We rely on your consent to process such personal data for marketing purposes.</p> <p>We rely on your consent to process such personal data for promotional purposes.</p> <p>We have a legitimate interest to process such personal data to provide service messages to you (these are not marketing messages).</p> |
| <p><i>If you attend Plexal:</i></p> | |
| <ul style="list-style-type: none"> • if you are one of our members' users of the Services and Facilities, we will process your Access Card Data and Member Representative Contact Data to allow you to access Plexal and to know who is our premises; • if you invite a visitor to attend Plexal, we will process your Member Representative Contact Data and your visitor's Visitor Contact Data to allow the visitor to access Plexal and meet with you; • if you attend an event held at Plexal, we will process your Event Attendance Data for the purposes of your registration at the event and to allow you to access Plexal; • anyone attending Plexal may be captured on our closed-circuit television (CCTV) and we will process your CCTV Data while you are in and around Plexal. You can request a copy of our CCTV policy from our reception; • if you provided us with feedback or respond to a survey, we will process your Survey and Feedback Data to enable us to improve our Services and Facilities, and our Website. We sometimes seek feedback in the form of NPS scores (which are not connected to you as an individual and are anonymous). | <p>We have a legitimate interest to process such personal data when you access Plexal for security purposes and for health and safety reasons or in case of emergency.</p> <p>We have a legitimate interest to process such personal data to allow your visitor to access Plexal and for security purposes.</p> <p>We process such personal data for the performance of the contract we have with you to enable you to attend the event and for security purposes.</p> <p>We have a legitimate interest to process such personal data for security purposes and crime prevention.</p> <p>We rely on your consent to process such personal data for feedback purposes.</p> |
| <p><i>If you use our Website:</i></p> | |
| <ul style="list-style-type: none"> • we will use your Contact Data to provide you with marketing information where you have signed up to receive marketing via our Website; | <p>In some instances, we rely on your consent to process such personal data for marketing purposes where you have specifically requested communications from us. In other circumstances, we rely on legitimate interests if we think the</p> |

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| <ul style="list-style-type: none"> • if you use our Intranet, you will be required to register any account and provide us with your Member Representative Registration Data to enable us to set up your account and to enable you to interact with other users of our Intranet; • as part of our Intranet, you can use a variety of services, and we process your personal data depending on the services you use as follows: <ul style="list-style-type: none"> ○ if you book a meeting room, we process your Member Representative Contact Data in order to secure the meeting room on your behalf and provide you with access to it; ○ if you raise a query with our help desk on our Intranet, we will process your Member Representative Contact Data in order to respond to your query and find a resolution; ○ you have the option to upload your Intranet Directory Data, which is encouraged to enable you to connect and network with other users of our Intranet; ○ you can message other users of our Intranet via the messaging facility as part of our Intranet and if you do, we will process your Member Representative Registration Data and Intranet Message Data in order to facilitate the transmission of messages between users of our Intranet; ○ you may participate in community groups on our Intranet and if you do, we will process your Member Representative Registration Data and Intranet Community Group Data in order to facilitate these community groups and to allow users to connect and network; • if you visit our Website, we will process your Technical Data for the purposes of optimising our Website for your device and, in the case of time zone settings, to enable you to see the times of our webinars and events according to the time zone you are based in; • if you visit our Website, we use cookies for a variety of purposes. We explain this in further in the section <i>Do we use cookies?</i> below. | <p>communication will be of interest to you.</p> <p>We process such personal data for the performance of the contract we have with you in order to enable you to access and use the features of our Intranet.</p> <p>We process such personal data for the performance of the contract we have with you in order to enable you to access and use the features of our Intranet.</p> <p>We have a legitimate interest to process such personal in order to provide our Website to you in a format that is appropriate for you needs.</p> <p>We rely on your consent to process such personal data for our use of cookies.</p> |
| <p><i>If you assist us in providing our Services and Facilities, or our Website:</i></p> | |
| <ul style="list-style-type: none"> • if you represent one of our suppliers who assists us in providing our Services and Facilities, or our Website, to our users, and you are the primary contact for the supplier, we will process your Contact Data along with the relevant Supplier Company Data. | <p>We have a legitimate interest to process such personal data for the purposes of receiving services from our suppliers.</p> |
| <p><i>Marketing:</i></p> | |
| <ul style="list-style-type: none"> • we will use your Contact Data to provide you with marketing information about our Services and Facilities (or similar services related to our Services and Facilities). This includes if you have subscribed to our newsletter via our Website or via the iPads displayed in various locations in Plexal. We usually send our marketing by email, but other methods may be used (such as by mail or phone). | <p>In some instances, we rely on your consent to process such personal data for marketing purposes where you have specifically requested communications from us. In other circumstances, we rely on legitimate interests if we think the communication will be of interest to you.</p> |

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| Promoting Plexal: | |
| <ul style="list-style-type: none"> if you use our Services and Facilities, you may be asked to provide a testimonial to help us to promote Plexal, if you agree to provide a testimonial we will process your Testimonial Data and use it for promotional purpose. | We rely on your consent to process such personal data for marketing and promotional purposes. |

Do we use cookies?

We use the following categories of cookies on our Website:

- Strictly Necessary Cookies:** these cookies are essential in order to enable you to move around our Website and use its features or to enable us to provide the Website features to you, including to ensure the security of our Website and prevent misuse of our Website. Without these cookies, services you have asked for such as remembering your login details cannot be provided and we will not be protect our Website from cyber attacks.
- Performance Cookies:** these cookies collect anonymous information on how you use our Website. For example, we use Google Analytics cookies to help us understand how visitors to our Website navigate the Website and to highlight areas where we can make improvements. The data stored by these cookies does not show personal details from which your individual identity can be established. You may opt out of these cookies using your browser settings but it may affect the performance of our Website.
- Targeting Cookies or Advertising Cookies:** these cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advert as well as help measure the effectiveness of an advertising campaign. These cookies also help us to measure the success of the campaigns we run by recording the number of visitors we have to particular pages of our Website and also the effectiveness of our Website by recording the time spent on a page of our Website (these particular cookies are anonymised). The cookies are usually placed by third party advertising networks. They remember the websites you visit and that information is shared with other parties such as advertisers. For example, we use third party companies to provide you with more personalised adverts when visiting other websites.
- Social Media Cookies:** these cookies allow you to share what you've been doing on our Website on social media such as Facebook and Twitter. These cookies are not within our control. Please refer to the respective privacy policies for how their cookies work.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your Internet browser for instructions on how to locate the file or directory that stores cookies. Information on deleting or controlling cookies is available at www.aboutcookies.org. By deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our Website.

To opt out of Google Analytics cookies across all websites, please visit: [Google Analytics Opt-out Browser Add-on](#) and for other third party cookies relating to behavioural advertising, please go to www.youronlinechoices.eu. Opting out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted out will no longer deliver adverts tailored to your web preferences and usage patterns, so you may see a greater number of adverts that are irrelevant to you and your preferences.

By continuing to use our website you are agreeing to our use of cookies.

How long do we keep your personal data?

We will only retain your personal data for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or regulatory requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Disclosure of your information

We may disclose your personal data to selected third parties in the circumstances set out below:

- **Third party service providers for business purposes:** in order to run our business, we rely on a number of carefully selected third parties to provide us with services and products. These include our payment processor, anti-fraud and credit check providers to keep us and you secure, analytics and email marketing companies to enable our marketing, client relationship management tools to manage our members and you, research companies to help us carry out surveys, information and/or technology providers to support, maintain and provide our technology and IT infrastructure, including to ensure the security of our Website and Intranet, and other carefully selected third parties. We permit these companies to use your personal data only to the extent necessary to provide us with their services and products; we do not allow these third parties to disclose or use your personal data for any other purposes. We have high expectations in their handling of your personal data, as you do in ours, and we hold them to these. If we are required to do so by law, we will obtain your consent to share your personal data with these third party service providers;
- **Advertisers for marketing purposes:** we may provide your personal data to our advertising and social media partners (including Facebook and Twitter, where you choose to use these social media partners in connection with our Intranet) where they require your personal data to select and serve relevant adverts about our Services and Facilities to you and others;
- **Advisory board and Innovation Programme sponsors:** we may share your Innovation Programme Application Data and Innovation Programme Company Data with our advisory board members and/or Innovation Programme sponsors for the purposes of giving our advisory board members and/or Innovation Programme sponsors the opportunity to assess your application to join an Innovation Programme and to assist with designing and shaping the Innovation Programme. In these circumstances we rely on your consent to share Innovation Programme Application Data and Innovation Programme Company Data with our advisory board members and/or Innovation Programme sponsors. Our advisory board and Innovation Programme sponsors will not use your personal data for marketing or sales purposes unless they have obtained your consent to do so.
- **Other users of our Intranet:** if you choose to engage with other users of our Intranet by posting comments in our community groups or sending private messages to other users, the other users of the community group or the recipient of your private message will see the personal data that you share with them;
- **Third parties where we are considering a corporate transaction:** in the event that we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets; and
- **To comply with legal requests:** if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or in order to enforce or protect our rights, the rights of our trusted partners and the rights of our members or other users of our facilities and services.

Your rights

You have the following rights regarding your information:

- to access personal data held about you;
- to request us to make any changes to your personal data if it is inaccurate or incomplete;
- to request your personal data is erased where we do not have a compelling reason to continue to process such data in certain circumstances;
- to receive your personal data provided to us as a data controller in a structured, commonly used and machine-readable format where our processing of the data is based on: (i) your consent; (ii) our necessity for performance of a contract to which you are a party to; or (iii) steps taken at your request prior to entering into a contract with us and the processing is carried out by automated means;
- to object to, or restrict, our processing of your personal data in certain circumstances;
- if we use your personal data for direct marketing, you can ask us to stop and we will comply with your request;
- if we use your personal data on the basis of having a legitimate interest, you can object to our use of it for those purposes, giving an explanation of your particular situation, and we will consider your objection;

- to object to, and not be subject to a decision which is based solely on, automated processing (including profiling), which produces legal effects or could significantly affect you; and
- to lodge a complaint with a data protection supervisory body, which is the Information Commissioner's Office.

To exercise any of your rights set out above, including to withdraw your consent where we have stated we are processing your personal data based on your consent, please contact us at connect@plexal.com.

How do I make a complaint?

If you are unhappy with how we've handled your information, please contact Brandon Hucq at Brandon@plexal.com, for data protection related complaints.

If you're not satisfied with our response to your complaint or believe our processing of your personal data does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO) at Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel: 0303 123 1113 or via its website at www.ico.gov.uk.

External Links

Our Website and Intranet may, from time to time, contain links to and from the websites of third parties, or plugins and other applications. 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 these policies. Please check these policies before you submit any personal data to these websites.

Changes to Our Privacy Policy

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where the changes are material, the changes will be notified to you by email.

This Privacy Policy was last updated on 3 August 2018. If you would like to receive a copy of a previous version of this Privacy Policy, please get in touch using the contact details below.

Contact

Please email us at connect@plexal.com if you are unsure about any of the information listed above or have further questions or comments regarding this Privacy Policy.