

Open Space Business Centres operates a privacy first approach to all our business activities and will only require the minimum information to perform our lawful processing.

How we use your information

This privacy notice tells you what to expect when Open Space Business Centres collects personal information. It applies to information we collect about:

Visitors to our websites

When someone visits www.openspacebusinesscentres.co.uk we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Cookies and Similar Technologies

When you visit the Services, a cookie may be stored on your computer. Generally, cookies and similar technologies work by assigning to your browser or device a unique number that has no meaning outside of the services. Open Space Business Centres uses these technologies to personalize your experience and to assist in delivering content specific to your interests. Additionally, after you've entered your member ID and password during a session on the Services, Open Space Business Centres saves that information so you don't have to re-enter it repeatedly during that session.

Most browsers automatically accept cookies. To manage the collection of information through cookies or other equivalent technology you can use the settings on your browser or mobile device. Open Space Business Centres is committed to providing you choices to manage your privacy and sharing. However, Open Space Business Centres does not recognize or respond to browser-initiated Do Not Track signals, as the internet industry has not fully developed Do Not Track standards, implementations and solutions. To learn more about Do Not Track signals, you can visit <https://allaboutdnt.com>. Not accepting cookies may make certain features of the Services unavailable to you. Open Space Business Centres may also use your IP address to identify you, to administer the Services and to assist in diagnosing problems with Open Space Business Centres' servers.

Log Files

The Services use log files. Stored information includes IP addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks. This information is used to analyse trends, administer, protect and secure the Services, track member movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses, etc., may be linked to session IDs, user IDs and device identifiers.

E-newsletter and Events

We use a third-party provider, Mailchimp, to deliver our monthly e-newsletters. We gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletter. For more information, please see [Mailchimp's privacy notice](#).

Security and performance

Open Space Business Centres uses a third-party service to help maintain the security and performance of each of the Open Space Business Centres' Websites. To deliver this service it processes the IP addresses of visitors to the Websites.

Website

We use a third-party service to publish our website. We use a standard service to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it.

People who call us

When you call Open Space Business Centres we do not collect Calling Line Identification (CLI) information. We will only ask for your personal information if you wish more information to be sent to you or if you wish to place an order with us.

Inbound and outbound calls may be recorded for training and fraud prevention purposes – these are processed in pen Space Business Centres' legitimate interest.

People who email us

We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.

We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

People who use our 'Contact Us' Service

If you use the 'Contact Us' Service we will receive an email which contains your name, email address, and the contents within any of the additional details fields. This information will not be shared with any other organisations.

People who use Open Space Business Centres' Services

We have to hold the details of the people who have requested our services in order to provide them. However, we only use these details to provide the service the person or organisation has requested. When people do subscribe to our services, they can cancel their subscription at any time and are given an easy way of doing this.

Where the personal information is not processed on behalf of a client, the data controller of your personal information shall be Open Space Business Centres Limited which is registered with the Information Commissioner's Office with registration number **ZA286931**.

Our website www.openspacebusinesscentres.co.uk record data relating to customer order processing and customer service. Open Space Business Centres shall be classed as a Data Controller where deciding the

manner in which data is processed when looking to meet our contractual obligations, for example where selecting third party suppliers to support our online systems.

Personal information we collect from you, or from a client relating to you, will be retained where we have an ongoing legitimate business need to do so (for example, to provide you or our clients with a service or to comply with applicable legal, tax or accounting requirements).

Email addresses of account holders may be used for targeted advertising campaigns, which can include direct emails and targeted advertisements through social media platforms such as LinkedIn and Facebook.

More information on Open Space Business Centres' processing activities relating to service provision shall be made available to our clients on engagement, on request or through our online services.

Special Categories of Personal Data

We do not knowingly or intentionally collect special categories of personal data from individuals and we request that you please do not submit special categories of personal data to us.

Prospects

Where promoting our services, we may purchase databases of business contacts within our target sectors. These contacts will only be purchased from credible sources who can provide sufficient assurances that they are meeting their data protection obligations. Our business contacts provider is Barbour ABI. Additionally, we may combine these records with other publicly available information to ensure that our records are accurate. Our primary market is Business to Business therefore Open Space Business Centres will only email, call or direct mail prospects where there is either evidenced consent or where there is a legitimate interest to do so. Where legitimate interest is considered the ground for processing, an assessment shall be made to ensure that this legitimate interest is valid that this interest does not outweigh an individual's right to privacy.

Your rights

Under data protection legislation, you have rights as an individual which you can exercise in relation to the information we hold about you.

You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

Complaints or queries

Open Space Business Centres tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Open Space Business Centres' collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office in their capacity as the statutory body which oversees data protection law – www.ico.org.uk/concerns .

Access to Personal information

Open Space Business Centres tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request'. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to Open Space Business Centres for any personal information we may hold you need to put the request in writing to the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting our Data Protection Officer.

Disclosure of personal information

In many circumstances we will not disclose personal data without consent, unless legally obliged to do so as part of contractual obligations with our customers (where you are a party to the agreement or service).

We may disclose your personal information to the following categories of recipients:

- to third party services providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Privacy Policy or notified to you when we collect your personal information.
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to enforce or apply our Terms of Service or other agreements or to protect Open Space Business Centres and its customers (including with other companies and organisations for the purposes of fraud protection and credit risk reduction)
- to complete any necessary management or submission of licensing rights to access data from information providers, most notably with respect to our data viewing or extraction services.
- to any other person with your consent to the disclosure.

Legal basis for processing personal information

If you are a visitor from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with/involving you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal

information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “How to contact us” heading below.

Third Party Websites

Please be aware that Open Space Business Centres does not control and is not responsible for websites that are referred to or linked from its own websites and that use of your personal information on these websites is not subject to this Privacy Policy.

Persons 18 or under

We are concerned to protect the privacy of children. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

If you believe that we have received information pertaining to or from persons under the age of 18 please contact us via the channels below. If we become aware that a person under the age of 18 has provided us with personal information, we will take steps to delete such information.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 25th May 2018

How to contact us

If you want to request information about our privacy policy, you can email us or write to:

Sarah Stewart
Open Space Business Centre
Blackmore Park Road
Willow End Park
Worcestershire
WR13 6NN
Email: info@openspacebc.co.uk