

Privacy and Cookies Policy

At Branchspace Limited and our affiliates (collectively, “Branchspace”, “us” or “we”), we respect your privacy and are committed to maintaining your trust and protecting your Personal Data, which is any information that is capable of identifying you as an individual person.

This Privacy Policy describes how we handle and protect Personal Data in connection with all Branchspace’s business processes.

Part 1 of this Privacy Policy applies to the Personal Data of job applicants and potential candidates for employment, employees, contractors, customers, prospects, website visitors and other external contacts corresponding with us by phone, e-mail or otherwise, in our capacity as Data Controller.

Part 2 of this Privacy Policy applies to clients and their users and any other categories of individuals who interact with us, in our capacity as Data Processor.

Part 3 of this Privacy Policy relates to our Cookie Policy

We reserve the right, in our sole discretion, to modify, alter or update our Privacy Policy at any time. Such modifications, alterations, and updates shall be effective immediately upon posting. Your continued use of this website following the posting of a modified, altered, or updated Privacy Policy will mean you accept those modifications, alterations or updates.

Part 1. Branchspace as a Data Controller

1. How We Collect your data

We collect your Personal Data as this Privacy Policy further describes when:

1.1 Personnel, job applicants and potential candidates for employment: when you apply to join the Branchspace team or contract with us directly;

1.2 Customers and customers’ personnel: when you subscribe to a service we provide;

1.3 Marketing prospects: when we collect information from you with your consent from live lectures (webinars or seminars) which you attend when one of our personnel is speaking or industry conferences which you attend, when you provide us with your business contact information (such as by handing over a business card). From time to time, we may also collect information that pertains to you through other sources, such as social media sites like linkedin.com and twitter.com;

1.4 Website visitors and other external contacts: when you use this site, register as a user or when we collect information from you with your consent when you are corresponding with us by phone, e-mail or otherwise.

2. How your information will be used. Purposes and legal basis of processing

2.1 Branchspace might need to keep and process information about you for normal recruitment, employment and other contractual or business-related purposes. The information we hold and process will be used for legal, administrative, management and operational purposes only, to run the business and manage our relationship with you effectively, lawfully and appropriately.

Personnel, job applicants and potential candidates for employment: We will use it during the recruitment process, whilst you are working for/with us, at the time when your contract ends and after you have left.

Customers and customers' personnel: We will use it to fulfil our contractual obligations with you or your employer and for our legitimate business interests. More specifically: to perform internal business processes (such as billing and accounting functions), to provide you or your organization with the information, products and services that you request from us, to send notices, such as communications about products and services and changes to our terms, conditions and policies.

Marketing prospects: We will use it to provide you or your organization with relevant information about our products and services. You may at any time choose not to receive marketing materials from us by following the unsubscribe instructions included in each e-mail you may receive, by indicating so when we call you, or by contacting us directly.

Website visitors and other external contacts: We will use it to respond to your enquiries or follow up our own enquiries.

2.2 Branchspace processes your Personal Data for the purposes described above: **(i) Personnel, job applicants and potential candidates for employment:** when necessary to enter into an employment contract with you or when necessary for the performance of your employment contract. **Customers and customers' personnel:** when contracting with you or your employer **(ii) All:** when necessary for us to comply with a legal obligation; **(iii) All:** when necessary for the purposes of our legitimate interests e.g. for administrative and marketing purposes, to protect the security and integrity of the website and our services; to prevent and detect fraud or other prohibited or illegal activity; to establish or exercise legal rights; in response to a court order, request for cooperation from a law enforcement or other government agency; for responsible corporate governance or as otherwise required or permitted by applicable laws and/or regulations; to protect and defend the rights, property or safety of Branchspace and/or other companies in the Branchspace group, its/their investors and other clients, staff, and/or service providers. or **(iv)** when we need to protect our legal position in the event of legal proceedings.

2.3 If and in so far as (i) to (iv) do not provide a lawful basis for processing and controlling your Personal Data, we shall obtain your consent to do so. If you do not provide this data, we

may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision;

If in the future we intend to process your Personal Data for a purpose other than that which it was collected and it is not for other lawful reasons such as to fulfil a contract or for legitimate reasons pursuant to GDPR, we will provide you with information on that purpose and any other relevant information.

2.5 If you are a **job applicant**, we may desire to retain your Personal Data to consider you for future employment opportunities. In such an event, we will seek your consent, either prior to or after you formally apply for a job opportunity. Much of the information we hold will have been provided by you, but some may come from other sources, such as managers and colleagues, or in some cases, external sources, such as referees.

2.6 **Website users.** We may use your Personal Data to: Personalize your experience; Improve our website and make the website easier for you to use; to respond to your enquiries or comments submitted through our website; match Personal Data with third party data. Also, we may keep track of what portions of the website and app users are visiting and other user statistics, and aggregate this information to help us create a better experience for users of our website. This is all done in order to describe our products and services to prospective partners, advertisers, and other third parties, and for other lawful purposes; create statistical reporting regarding our web activities. Our **Cookie Policy** applies.

3. Categories of personal information

The type of personal information Branchspace holds includes (without limitation):

3.1. **Personnel and prospective personnel:** interview notes, CV and references (personnel); correspondence with or about you; contact details (home and business;). Categories of Personal Data specific to employees and contractors of Branchspace are listed in our Personnel Policy.

3.2 **Personnel Only:** Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time. You will receive GDPR training and this Privacy Policy is an important part of that training.

3.3 **Customers, customers' personnel and Marketing prospects:** Branchspace may collect personal information such as your name, e-mail address and telephone number;

3.4 **Website visitors and other external contacts:** we will keep a record of our correspondence with you and your contact details.

4. Non-personal information

We may collect information about your visit to and use of this site, including sales data, traffic data and related site information. We may also collect anonymised information during the course of services which we provide. This information helps us to evaluate and improve our site and services and may also be used for investment analysis purposes. As Non-Personal Data does not personally identify you, we may use it for any purpose.

5. Transfer of Personal Data to third parties

5.1 We will not share your personal information with anyone, except where we are required to do so to comply with the law, to protect our rights, to improve and expand our products and services or to efficiently operate our business.

5.2 We may transfer information about you to other group companies for purposes connected with the administration and management of Branchspace's business. We will always ensure that these organisations are obligated by written agreement to equivalent obligations in relation to the security of data processing as are imposed on Branchspace under the General Data Protection Regulation (GDPR).

5.3 In some circumstances, where needed for the purpose of administering and managing your relationship with Branchspace, your information may be transferred to our third-party providers located throughout the globe, including outside of the European Union ("EU") and in countries where the local law may grant you fewer rights than you have in your own country. Where required by law, we have taken appropriate technical and organisational measures to secure the integrity and confidentiality of your personal information. If you would like more information about these measures, which may include the EU's Standard Contractual Clauses, please contact us at the address below. By providing us with your Personal Data in such circumstances you agree to such transfers of your Personal Data. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy. Branchspace endeavours to apply suitable safeguards to protect the privacy and security of your Personal Data and to use it only consistent with your relationship with Branchspace and the practices described in this Privacy Policy. Branchspace also minimizes the risk to your rights and freedoms by not collecting or storing sensitive information about you (unless you are prospective or current personnel).

5.4 Third parties we might share your information with include:

- a. Outsourced IT providers
- b. Professional advisers, such as accountants and solicitors
- c. Potential purchasers or investors
- d. Document Storage and Knowledge Base application
- e. Current and prospective customers

6. Retention periods

6.1 Branchspace retains Personal Data, as necessary, for the duration of the relevant business relationship. We may also retain Personal Data for longer than the duration of the business relationship should we need to retain it to protect ourselves against legal claims, use it for analysis or historical record-keeping, or comply with our retention policies and schedules. The criteria used to determine our retention periods include:

- a. The length of time we have an ongoing relationship with you;
- b. Whether there is a legal obligation to which we are subject;
- c. Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

For more information on where and how long your Personal Data is stored, and for more information on your rights of erasure and portability, please contact Branchspace's data protection officer at data.protection@branchspace.com

7. Security of your Personal Data

To help protect the privacy of data and personally identifiable information processed by us, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your Personal Data to those Branchspace personnel who need to know that information to provide benefits or services to you. In addition, we train our personnel about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

8. Your rights

8.1 Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your Personal Data. These include: the right to request from us access to and rectification or erasure of your Personal Data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability:

8.1.1 The right to be informed. If you would like to be informed as to what we do with your information. This includes but is not limited to the right to know what information we gather, process and store, what we do with it, who we share it with and how long we keep it for. This information is set out in this policy;

8.1.2 The right of access. If you would like to make a request to access, review, or correct the Personal Data we have collected about you, or to discuss how we process your Personal Data, please contact us at data.protection@branchspace.com

8.1.3 The right to restrict processing and the right to object. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

8.1.4 The right to rectification. We will correct or erase inaccuracies in the information we hold about you when we learn of the inaccuracy.

8.1.5 The right to data portability. In certain circumstances, you have the right to request the information we hold on you in a machine readable format so that you can transfer it to other services.

8.1.6 The right to erasure. Personal Data may be erased if we do not have a contractual or legitimate reason for retaining the information

8.2 You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your Personal Data. (www.ico.org.uk) Please copy any such communication to us so that we can work to resolve any outstanding issues promptly.

Branchspace retains the right to use reasonable measures to authenticate the identity of any individual who requests access to their personal information or otherwise raises any questions.

9. Identity and contact details of controller

9.1 Branchspace Limited is the controller of data for the purposes of the DPA 18 and GDPR (prospective and contracted personnel).

9.2 If you have any concerns as to how your data is processed you can contact us at:
Branchspace Limited, 19 Langham Street, London W1W 6BP, UK
data.protection@branchspace.com

Part 2. Branchspace as a Data Processor

1. How We Collect your data

We collect your Personal Data as this Privacy Policy further describes when we are contracted with a client (the Data Controller) and the information is collected by either:

1. Our client or their partners using their systems. As your product or service provider, they will have provided Personal Data to us to enable us to fulfil our contract with them
2. Branchspace using our systems, which process data on the behalf of our clients in order for us to deliver our contracted services to them.

2. How your information will be used. Purposes and legal basis of processing

2.1 During the course of our business, Branchspace collects, receives, processes, stores and transmits information provided by end users to our clients and their partners. We will use it to fulfil our contractual obligations with your product or service provider (i.e. our client, the Data Controller) and for our legitimate business interests. More specifically: to process travel bookings (e.g. to make and change travel reservations and issue travel related documents); to provide travel operators, travel agencies, travel management companies and their suppliers with access to traveller information so that they can process travel bookings; to support payment, billing and accounting functions related to travel bookings; to perform related internal business processes (such as testing, quality assurance, operational support including client help desk services, and product development and enhancement); to conduct scientific, statistical, and research activities regarding travel and traveller behaviour and related system behaviour.

2.2 Branchspace processes your Personal Data for the purposes described above: (i) when contracting with your product or service provider; (ii) when necessary for us to comply with a legal obligation; (iii) when necessary for the purposes of our legitimate interests e.g. Protect the security and integrity of the website and our services; Prevent and detect fraud or other prohibited or illegal activity; In response to a court order, request for cooperation from a law enforcement or other government agency ; or (iv) when we need to protect our legal position in the event of legal proceedings.

2.3 If and in so far as (i) to (iv) do not provide a lawful basis for processing and controlling your Personal Data, we shall obtain your consent to do so. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision;

2.4 We may sometimes need to process your data to pursue our legitimate business interests, for example for administrative purposes, to prevent fraud, or to report potential crimes.; To establish or exercise legal rights; To bring or defend legal claims; For responsible corporate governance or as otherwise required or permitted by applicable laws and/or regulations; In circumstances in which we believe disclosure is appropriate in connection with fraud prevention and prevention of other illegal, or unlawful activity or any other activity which is or may be contrary to our legal and regulatory compliance obligations; To protect and defend the rights, property or safety of Branchspace and/or other companies in the Branchspace group, its/their investors and other clients, staff, and/or service providers.

If in the future we intend to process your Personal Data for a purpose other than that which it was collected, and it is not for other lawful reasons such as to fulfil a contract or for legitimate reasons pursuant to GDPR, we will provide you with information on that purpose and any other relevant information.

3. Categories of personal information

The type of personal information Branchspace holds includes (without limitation):

3.1 **Private contact and identification data** for example, name, surname, gender, address, e-mail address, telephone number, date and place of birth, identification numbers, nationality

3.2 **User/device data** for example IP Address, Geolocation, device characteristics e.g. web browser

3.3 **Contract data / transaction data** for example, purchased products, services (financial), date of purchase contract, purchase price, extract, guarantees, name, surname the person signing the contract, travel documents and associated reference numbers, payment ID

4. Non-personal information

We may collect information about your visit to and use of this site, including sales data, traffic data and related site information. We may also collect anonymised information during the course of services which we provide. This information helps us to evaluate and improve our site and services and may also be used for investment analysis purposes. As Non-Personal Data does not personally identify you, we may use it for any purpose.

5. Transfer of Personal Data to third parties

5.1 We will not share your personal information with anyone, except where we are required to do so to comply with the law, to protect our rights, to improve and expand our products and services or to efficiently operate our business.

5.2 We may transfer information about you to other group companies for purposes connected with the administration and management of Branchspace's business. We will always ensure that these organisations are obligated by written agreement to equivalent obligations in relation to the security of data processing as are imposed on Branchspace under the General Data Protection Regulation (GDPR).

5.3 In some circumstances, where needed for the purpose of administering and managing your relationship with Branchspace, your information may be transferred to our third-party providers located throughout the globe, including outside of the European Union ("EU") and in countries where the local law may grant you fewer rights than you have in your own country. Where required by law, we have taken appropriate technical and organisational measures to secure the integrity and confidentiality of your personal information. If you would like more information about these measures, which may include the EU's Standard Contractual Clauses, please contact us at the address below. By providing us with your Personal Data in such circumstances you agree to such transfers of your Personal Data. We will take all steps

reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy. However, where we are processing Personal Data on behalf of client or its customer, in such circumstances the client with whom you contracted (who has passed to us your Personal Data to fulfill a contractual obligation) is the Data Controller to whom any concerns that you may have in respect of your Personal Data should be addressed in the first instance, as we act upon the written instructions of such third party Data Controller. Where Branchspace clients or their customers are based in the United States and you have contracted with or are employed by that client/customer, information we collect from you may be processed in the United States. The United States has not sought nor received a finding of “adequacy” from the European Union under Article 45 of the GDPR. Branchspace relies on derogations for specific situations as set forth in Article 49 of the GDPR and the client’s Privacy Shield. In particular, Branchspace collects and transfers to the U.S. Personal Data only: with your consent; to perform a contract with you or your product or service provider; or to fulfil a compelling legitimate interest of Branchspace in a manner that does not outweigh your rights and freedoms. Branchspace endeavours to apply suitable safeguards to protect the privacy and security of your Personal Data and to use it only consistent with your relationship with Branchspace and the practices described in this Privacy Policy. Branchspace also minimises the risk to your rights and freedoms by not collecting or storing sensitive information about you (unless you are prospective or current personnel).

5.4 Third parties we might share your information with include:

- a. Our clients and their partners in order to fulfil our obligations to our clients as their Data Processor as per 2.1
- b. Outsourced IT providers and sub-contractors who process data on our behalf (in their capacity as a Sub-processors), for services such as: cloud hosting, application monitoring and alerting, help desk and incident management, technical operations

6. Retention periods

6.1 Branchspace retains Personal Data in order to comply with contractual obligations to our clients (the Data Controller) in our capacity as a Data Processor, and for the purposes described in this Privacy Policy (section 2).

6.2 We will delete Personal Data when it is no longer necessary to fulfil our obligations to the Data Controller, unless it is required for legal compliance or to protect ourselves against legal claims.

For more information on where and how long your Personal Data is stored, and for more information on your rights of erasure and portability, please contact Branchspace’s data protection officer at data.protection@branchspace.com

7. Security of your Personal Data

To help protect the privacy of data and personally identifiable information processed by us, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your Personal Data to those Branchspace personnel who need to know that information to provide benefits or services to you. In addition, we train our personnel about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

8. Your rights

8.1 Under the General Data Protection Regulation (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your Personal Data. These include: the right to request from us access to and rectification or erasure of your Personal Data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability:

8.1.1 The right to be informed. If you would like to be informed as to what we do with your information. This includes but is not limited to the right to know what information we gather, process and store, what we do with it, who we share it with and how long we keep it for. This information is set out in this policy;

8.1.2 The right of access. If you would like to make a request to access, review, or correct the Personal Data we have collected about you, or to discuss how we process your Personal Data, please contact us at data.protection@branchspace.com

8.1.3 The right to restrict processing and the right to object. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

8.1.4 The right to rectification. We will correct or erase inaccuracies in the information we hold about you when we learn of the inaccuracy.

8.1.5 The right to data portability. In certain circumstances, you have the right to request the information we hold on you in a machine-readable format so that you can transfer it to other services.

8.1.6 The right to erasure. Personal Data may be erased if we do not have a contractual or legitimate reason for retaining the information

8.2 You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your Personal Data. (www.ico.org.uk) Please copy any such communication to us so that we can work to resolve any outstanding issues promptly.

Branchspace retains the right to use reasonable measures to authenticate the identity of any individual who requests access to their personal information or otherwise raises any questions.

9. Identity and contact details of controller/processor

9.1 Branchspace Limited is a Data Processor when processing Personal Data on behalf of its clients and their partners. Where we process your Personal Data on behalf of one of our clients and their partners, it will be the client who is the Data Controller primarily responsible for your Personal Data; we shall be a Data Processor acting upon the instructions of that client with whom you are contracted. In the first instance you should direct any queries regarding your Personal Data to that client with whom you have a contract.

9.2 If you have any concerns as to how your data is processed you can contact us at:

Branchspace Limited, 19 Langham Street, London W1W 6BP, UK

data.protection@branchspace.com

Part 3. Cookies

1. As is true of most other websites, the Branchspace website collects certain information automatically and stores it in log files. The information may include internet protocol (IP) addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the use of the Branchspace website, including a history of the pages you view. We use this information to help us design our site to better suit our users' needs. We may also use your IP address to help diagnose problems with our server and to administer our website, analyse trends, track visitor movements, and gather broad demographic information that assists us in identifying visitor preferences. The Branchspace website also uses cookies and web beacons. It does not track users when they cross to third party websites, does not provide targeted advertising to them, and therefore does not respond to Do Not Track (DNT) signals.

2. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognise your browser and capture and remember certain information. Cookies make web-surfing easier for you by saving your preferences so that we can use the saved information to facilitate your use of our website when you return to the website. The use of cookies is an industry standard, and as such, you will find that most major websites use them.

3. We use cookies to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

Please see our **Cookie Policy** for more detail.

Cookie Policy

When you first use this site, once you take any action at all, you will consent to the cookies being enabled. You will receive notification to this effect.

Branchspace respects the privacy of all visitors to our website. This Cookie Policy outlines our policy concerning the use of cookies on this website. We may update our Cookie Policy from time to time to reflect any changes in technology or legislation which may affect the way in which cookies are used by us and how you as a user, can manage them and we will publish any updates on this website.

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the sites or service providers systems to recognize your browser and capture and remember certain information. Cookies make web-surfing easier for you by saving your preferences so that we can use the saved information to facilitate your use of our website when you return to the website. The use of cookies is an industry standard, and as such, you will find that most major websites use them.

We use cookies to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

Most cookies expire after a defined period of time, or you can delete your cookie file at any time. Most web browsers are initially set up to accept cookies. You can reset your web browser to disable cookies or to indicate when a cookie is being sent. However, note that some parts of our Service may not function properly or may be considerably slower if you refuse cookies. Additional information about cookies, including opting-out of certain cookies, please visit: www.aboutcookies.org.

When you use this website the following types of cookies can be set on your device:

1. Strictly Necessary Cookies

These cookies enable Services that you have specifically asked for. These cookies do not usually contain any personally identifiable information and are typically set by websites to provide services such as eCommerce and log in facilities. For example, these cookies identify you as being signed in to websites and enable you to remain logged in throughout your visit;

Our content management system (CMS) uses session cookies that cannot be disabled.

2. Performance Cookies

These cookies are used to collect statistical information about visitors of the website and the pages they view.

These cookies do not collect information that identifies a visitor. The information these cookies collect is aggregated and used anonymously. We use these cookies to understand what content is popular which helps us to improve our website.

3. Functional Cookies

These cookies allow the website to remember choices you make and provide enhanced and more personal features. Some examples of such features include:

- Remembering your preferences and settings such as redirect to mobile version of the site when you are browsing with a smartphone
- Remembering your favourites when browsing particular websites

If you have an account on a particular website, a cookie on your computer lets the website remember your user name and email address so you don't have to enter it again when you are commenting or writing a review.

4. Other Third Party Cookies

Some cookies that have been set on our websites are not related to Branchspace. When you visit a page with content embedded from, for example, YouTube or Facebook, these service providers may set their own cookies on your web browser. We do not control the use of these cookies and cannot access them due to the way that cookies work, as cookies can only be accessed by the party who originally set them. You should check the third party websites for more information about these cookies.