

Impact Hub King's Cross Ltd

GDPR Compliance

We are Impact Hub King's Cross, the controller of personal data processed through the website kingscross.impacthub.net and <https://impacthubkingscross.spaces.nexudus.com/> and in relation to Impact Hub King's Cross members, clients and partners. We are also controller for the data of those participating in the "[Build Back Better Hackathon](#)" ("Hackathon"). At all times we aim to comply with data protection law (which is contained for the most part in the General Data Protection Regulation (GDPR) (EU) 2016/679).

The Impact King's Cross Ltd is committed to GDPR compliance, and we continue to work to make sure that we are achieving a high standard in data protection and privacy protection.

This is our Privacy Policy, or "Privacy Notice". In addition to this Policy, Impact Hub King's Cross also has Terms of Service.

Last reviewed: 21 January 2021

This Privacy Policy belongs to The Hub Kings Cross Limited, trading as Impact Hub Kings Cross with registered and trading address at 34b York Way, N1 9AB London, England and registered with Companies House under number 06332167; and Impact Hub Kings Cross Limited, our not-for-profit sister company, registered at and trading from the same address and registered with Companies House under number 09015218. We are also registered with the Information Commissioner's Office as a fee-paying controller, under reference number ZA591932.

You can contact us via:

- Email address: kingscross.hosts@impacthub.net
- The contact form at the bottom of our website
- Telephone number: 020 7841 3450

1. INTRODUCTION

1.1 As someone whose data we process, you have the right to protection of that personal data. How Impact Hub King's Cross performs this protection is described in this Privacy Policy. We are committed to safeguarding the privacy of our (website) visitors and Impact Hub King's Cross members, clients and partners including participants in the Hackathon.

1.2 Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. We define what we mean by personal data in detail in section 2 below.

1.3 This policy applies where we are acting as a data controller with respect to the personal data of (website) visitors and Impact Hub King's Cross members, clients, partners and Hackathon participants; in other words, where we determine the purposes and means of the processing of that personal data.

1.4 We use cookies on our website for the provision of our website and services, as well as for analytics purposes to help us improve our product offering. See chapters 8-11 for our cookie policies.

1.5 The Impact Hub King's Cross service incorporates the possibility for members to determine whether or not your profile is visible to other members and to change your profile information. By using the profile control function, you can specify whether your profile will be published to our community and you can add and change the profile information that is visible. You can access these controls by signing in to your Impact Hub King's Cross profile on the member admin portal and if activated by you, on the Community App. Below each newsletter is a button to unsubscribe.

1.6 We do not sell our member and contact data to any third party. We do not share or give away data to third parties unless it is in line with the purposes that we describe in chapter 2.

1.7 In this policy, "we", "us" and "our" refer to Impact Hub King's Cross as a provider and as a controller of personal data.

2. HOW WE USE YOUR PERSONAL DATA

2.1 In this Section 2 we have set out:

1. the general categories of personal data that we may process;
2. the purposes for which we may process personal data; and
3. the legal bases of the processing.

2.2 We may process data about your use of our website and services ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analyzing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

2.3 We may process your account data ("account data"). The account data may include your name, company name, contact- and address details and data required to process invoices and payments (for example your bank account number). The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website and tools, providing our services, ensuring the security of our online tools, administrative processing of invoices and payments and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our services, and we have assessed that those legitimate interests are not outweighed by the interests of data subjects OR the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

2.4 We may process information contained in any inquiry you submit to us regarding services ("inquiry data"). The inquiry data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal basis for this processing is consent OR your directly communicated interest in the relevant services.

2.5 We may process information relating to our customer relationships, including customer contact information ("customer relationship data"). The customer relationship data may include your name, your employer, your company, your job title or role, your contact details, information contained in communications between us and you or your employer. The source

of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is consent OR our legitimate interests, namely the proper management of our customer relationships, and we have assessed that those legitimate interests are not outweighed by the interests of data subjects.

2.6 We may process information relating to transactions, including purchases of services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details, your payment identification data and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely the proper administration of our business, and we have assessed that those legitimate interests are not outweighed by the interests of data subjects.

2.7 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent OR the performance of a contract between you and us.

2.8 We may process information contained in or relating to any communication that you send to us, this includes also information that you publish yourself on our online Community App ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you, for record keeping or for providing you with a platform to connect with fellow-members. The legal basis for this processing is our legitimate interests, namely the proper administration of our business, the provision of our services and facilitating communication with our members and clients, and we have assessed that those legitimate interests are not outweighed by the interests of data subjects.

2.9 We may process information that you provide to us for delivering our services ("service delivery data"). The service delivery data may include information about your personal skills, your company, information related to you as an entrepreneur and the status of your entrepreneurial trajectory. The service delivery data may be processed for the purposes of providing you with our services and supporting you in your entrepreneurial trajectory through our programmatic activities, courses and/ or events. The legal basis for this processing is consent OR the performance of a contract between you and us.

2.10 We may process any of your personal data identified in this policy for statistical and academic analysis. The data may be processed for the purpose of improving our services, tracking our performance or to advance general scientific knowledge in the field. When we make use of external providers for the analysis of such data we make sure that the data are either available in the public domain already, processed with your consent or anonymized in such a way that an individual subject cannot be identified. The legal basis for this processing is consent OR our legitimate interests, namely advancing the field of social innovation and entrepreneurship, and we have assessed that those legitimate interests are not outweighed by the interests of data subjects.

2.11 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate

interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others, and we have assessed that those legitimate interests are not outweighed by the interests of data subjects.

2.12 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks, and we have assessed that those legitimate interests are not outweighed by the interests of data subjects.

2.13 We may also process your personal data for the purposes of supporting the Hackathon. In this regard we may be collecting data on participants, mentors and partners, including names, contact details, some demographic data and details of expertise. Our purposes for doing so would be 1. to contact you with details of how to participate in the Hackathon, 2. to allow you to participate in the Hackathon, including connecting with other participants, 3. to provide anonymised aggregated details of our participants to the press. The legal basis for this processing is our legitimate interests and those of our Hackathon partners, and we have assessed that those legitimate interests are not outweighed by the interests of data subjects.

2.14 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

3. PRINCIPLES OF DATA PROTECTION

3.1 In this Section 3, we provide information about the principles of data protection that we adhere to.

3.2 Impact Hub King's Cross will protect the data files so that only the authorized personnel defined by Impact Hub King's Cross, have access to the file. These Impact Hub King's Cross authorized personnel may be Impact Hub King's Cross employees, volunteers, subcontractors or funders.

Impact Hub King's Cross ensures that all data systems and computer equipment are sufficiently protected with appropriate technical methods, including passwords and personal user IDs.

3.3 If Impact Hub King's Cross uses third parties for technical maintenance of the data or for support and processing functions, Impact Hub King's Cross strives to ensure that the subcontractor can and will protect the registered data as required in accordance with applicable data policies.

3.4 If Impact Hub King's Cross receives funding from third parties for business support, we may share the data with these funders for impact measurement functions, In these cases, Impact Hub King's Cross strives to ensure that the funder can and will protect the registered data as required in accordance with applicable data policies.

3.5 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.6 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. TRANSFER OF YOUR PERSONAL DATA

4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

4.2 Impact Hub King's Cross is located and registered in, and generally has its operations in England, which is part of the European Economic Area (EEA).

4.3 Beyond connecting to the local Impact Hub community, becoming a member of Impact Hub King's Cross comes with the opportunity to connect and collaborate with the global Impact Hub Network. To facilitate this opportunity of exchanging and collaborating on a global level, Impact Hub provides Customer with access to our own social networking platform, the Community App. In order to create a personal profile on the community app, Impact Hub King's Cross will share some information about you with the provider of the Community App, Impact Hub GmbH, Lindengasse 56 / 18-19, 1070 Vienna, Austria. Until you actively join the Community App, this shared information will be only available to the responsible employees of Impact Hub GmbH and the employees of Impact Hub King's Cross. To learn more about who Impact Hub GmbH is, how it will treat and keep safe your personal data, and how you can direct the processing of your personal data, please take a look at the Data Policy.

4.4 We employ a number of third party data processors (the most important ones are listed in Section 4.5, the complete list is available upon request). Transfers to these processors will be protected by appropriate safeguards, namely the use of standard data protection clauses. We will take reasonable and appropriate steps necessary to ensure that all third parties engaged as sub-processors are processing the personal information we entrust to them in a manner that is consistent with the requirements of the GDPR.

4.5 Third party processors:

| Processor Name: | Processing Activities: | Data Location(s): |
|-----------------|---|-------------------|
| Nexodus Cloud | Member and Client Relationship Management Services and Invoice Provider | United Kingdom |
| Impact Hub GmbH | Hosting, Technical, Content and Service Provider | Austria |
| Google, Inc. | Cloud Data and Service Provider | United States |
| Dropbox | Cloud Data Storage Provider | United States |

| | | |
|----------------|---|---------------|
| Salesforce | Cloud Collaboration Platform and Member Directory | United States |
| Eventbrite | Cloud Event Services and Ticketing | United States |
| Facebook | Relationship Management and Marketing Services | United States |
| Instagram | Relationship Management and Marketing Services | United States |
| LinkedIn | Relationship Management and Marketing Services | United States |
| Token of Trust | ID checking and Know Your Customer provider | United States |

5. RETAINING AND DELETING PERSONAL DATA

5.1 We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. After this data is no longer necessary, we will delete or anonymize data in our possession within a reasonable time frame, except such data as we determine may be needed to resolve disputes, enforce agreements, and comply with business, technical, or legal requirements related to our business.

6. AMENDMENTS

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

6.3 We will notify you of significant changes to this policy by email, newsletter or through the Impact Hub King's Cross software.

7. YOUR RIGHTS

7.1 In this Section 7, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

1. the right to access;
2. the right to rectification;
3. the right to erasure;
4. the right to restrict processing;
5. the right to object to processing;
6. the right to data portability;

7. the right to complain to a supervisory authority; and
8. the right to withdraw consent.

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.

7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

7.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

7.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.10 To the extent that the legal basis for our processing of your personal data is:

1. consent; or
2. that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However this right does not apply where it would adversely affect the rights and freedoms of others, or in circumstances where the retrieval of such data would pose an undue burden on the data processor.

7.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement. The contact information of our EU Representative may be found in Section 13.

7.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.13 You may exercise any of your rights in relation to your personal data by written notice to us.

8. ABOUT COOKIES

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

9. COOKIES THAT WE USE

9.1 We use cookies to:

1. recognize your browser and user session
2. keep track of what pages you have visited
3. store your user preferences
4. perform analytics to help us make our service better
5. assist with administration and security for our website and software, and to
6. send offers and provide marketing relevant services

10. COOKIES USED BY OUR SERVICE PROVIDERS

10.1 Our service providers may use cookies and those cookies may be stored on your computer when you visit our website.

10.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available [here](#).

11. MANAGING COOKIES

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

1. [Chrome](#);
2. [Firefox](#);
3. [Opera](#);
4. [Internet Explorer](#);
5. [Safari](#); and
6. [Edge](#).

11.2 Blocking all cookies will have a negative impact upon the usability of many websites.

11.3 If you block cookies, you will not be able to use all the features on our website.