

# Privacy Policy

**Updated:** Oct 19th, 2021

This policy describes the information we collect/process to best support the Embassy House app, built upon Andcards.com software. Including, but not limited to, the backend and admin through Andcards cloud services and Andcards App as well as web products (unless specified otherwise).

Embassy for Entrepreneurs AB, the company is incorporated under Swedish law, *Company ID:559081-6418* and its affiliates and subsidiaries (*collectively the "Company," "we," "us," "Embassy", and "our"*), respects your privacy rights and is committed to protect any data or information collected through services and websites accessed through internet-capable hardware platforms. This includes but is not limited to personal computers, mobile computers and/or mobile devices.

Embassy House provides Flexible offices, Co-working spaces, Co-living spaces, Powered by Embassy workspaces and Hybrid solutions as a workspace and apartment hotel services.

We have built our services to best assist our tenants in getting the most out of their selected space.

As a provider of information and communication services, we strive to comply with relevant laws and privacy protection rules and guidelines of certain countries. **For example European Union Directive 2016/680 and Regulation 2016/679 ("GDPR").**

As a data processor on behalf of the workspace provider, we comply with relevant legislation as stated in the Data Processing Agreement between andcards and said workspace provider.

We have adopted this privacy policy to explain how we collect, store, disclose, transfer, protect, and otherwise use the information collected in connection with our services (*the "Privacy Policy"*).

**Please read the following Privacy Policy carefully. By visiting our website, chatting with our Customer Support, connecting with us by other means and/or becoming a Workspace Provider, you agree that (a) we may transfer, process, and store your/your representative's information in the Republic of Korea and other countries that may have different privacy protections than your country; (b) we may process your or your representative's data in accordance with the following Privacy Policy; and (c) you are bound by our Privacy Policy.**

## ***Who does this privacy policy apply to?***

This Privacy Policy applies to all visitors of our website, Workspace Providers and their contact persons, our partners, potential clients or partners and their representatives ("you" or "your").

For services offered by andcards and used by residents of the European Union, we are the data processor of user's (see definition in our Terms of Use) personal information. Workspace Provider is the data controller responsible for users' personal information.

For Services offered by andcards, we are responsible for the personal information of all visitors to our website, persons who contact us, workspace providers contact persons, our partners, potential clients and their representatives.

## ***Where does this Privacy Policy apply?***

This Privacy Policy applies to the company's services, products, websites, mobile applications, and other services that link to or display it. In addition, the company may also, from time to time, add new sites and services.

This Privacy Policy does not apply to websites or services maintained by other companies or organizations (such as workspace providers or those who promote the company's products and services) and the company can not and does not guarantee the security of any information disclosed to those third parties. In addition, please note that we may hire vendors (agents/contractors) to collect information on our behalf and in such cases such vendors will be instructed to comply with this Privacy Policy. These vendors may **not** use your information for their own marketing purposes.

## ***Information we collect***

We collect data from you through our/your interactions and usage of our products/services. The data we collect is provided by you, this includes personal information that both identifies you and allows us to contact you/your representatives online and offline. All information is collected on a voluntary basis.

Data is collected in regards to your interactions/usage/experiences with our services, as well as that which you provide directly to us. The data we collect depends on the context of your interactions with us and the choices you make.

We process the gathered data to provide services, therefore the types of information we collect depends on how you use/interact with our services.

When you submit information to the Company, it will usually take the form of:

- Subscribing to newsletters or alerts;
- Scheduling demo of our services;
- Downloading demos, programs, or other software;
- Requesting customer support;
- Contact with andcards employees; or otherwise through use of our services, including mobile products, and computer products where your information is required for use.

Your refusal to submit information may limit your ability to use services, which requires provision of such information.

### ***Information we handle as a Data Processor***

Our services are solely for workspace providers using our product to work with their clients. As a data controller we do not collect/process any personal information of users. Any data collected/processed is in accordance with the Data Processing Agreement between Andcards and relevant workspace providers.

### ***Information we collect***

#### ***Customer Support and Communication (Required)***

Providing us with information relating to your usage of our services as well as how to contact you allows us to provide efficient technical/customer/other support via email, chat etc.

Example: Sending us an email with information relating to our website performance/other issues.

All information shared with us/customer support is used solely for the purposes of; identifying you, providing technical/customer support, resolving any issues, answering questions and improving our services.

Technical information may be used for statistical and/or marketing purposes as well as technical improvement of services.

## ***Automatically collected information***

### ***How we use/store automatically collected information***

We collect information from devices that are integrated with our services, this may include computers, phones and other internet-connected devices. Information about said devices and their usage within our services allows us to guarantee/improve functionality, stability and overall security and thus provide you with a better operative experience. *(We may combine your information across other computers or devices that you use).*

## ***Usage and Log Information***

We collect service-related, diagnostic, and performance information. This includes data on your activity (*ex: how you use our services*), log files, diagnostics, website and overall performance logs and reports.

## ***Device and Connection Information***

We collect device-specific information when you install, access, or use our services. This includes information such as hardware model, operating system information, browser information, IP address, mobile network information (*includes phone number and device identifiers*). **We do not store device location information.**

## ***Cookies***

Cookies are small files placed on your device to store data that can be recalled by a web server in the domain that placed the cookie. We use cookies for storing your preferences and settings, providing interest-based advertising, combating fraud, analyzing how our products perform and fulfilling other legitimate purposes.

Cookies allow us to provide, improve, analyse and customize our services to best suit your needs.

*For detailed information please read our Cookies Policy.*

## ***How we use/Share information***

We use the data collected to best provide you with a good user experience and help us operate our services efficiently.

In particular, we use the data to:

- Provide our services (this includes updating, securing, and troubleshooting, as well as providing support)
- Improve and further develop our services
- Advertise and market our services (this includes sending promotional communications, and presenting you with relevant offers)

*We also use the data to operate our business, which includes analyzing our performance, meeting our legal obligations, developing our workforce and general research. By using our services you agree to share information relevant to said services.*

## **Our Services**

We operate and provide our services, this includes; providing customer support, improving functionality, fixing issues and overall customization. The purpose of the collection of usage data is to better understand how you use our services and thus allowing us to evaluate and improve user experience, research/develop, test new service features as well as conduct troubleshooting activities. *Your information is also used to best respond to you when you contact us.*

We use data analytics to improve on, fix and customize our services as well as for marketing purposes. Because of this, we require workspace providers to turn over the anonymized users' information that is required for such purposes.

## **Safety and Security**

To protect your information, we follow the accepted industry standards and maintain reasonable safeguards in attempt to ensure the security, integrity, and privacy of the information you have provided. We have security measures in place designed to best protect against the loss, misuse, and alteration of any information under our control. *The information collected by us is stored in secure operating environments that are not available to the public.*

To ensure our services are being used legally, we verify activity as well as promote safety and security both on and off our services. *(This includes but is not limited to investigating any suspicious activity or violations of our terms).* We have security modules in place that help protect your information from hackers as well as implement secure communications protocol for information exchanged within our services *(this protects against third parties reading them).*

***This being said, no system can be 100% secure and human errors do occur, this means there is the possibility that there could be unauthorized access to your information. By using our services, you assume this risk.***

## ***Do we collect children's personal information?***

The Company does not knowingly collect personal information from children under 16 years old (*or any persons that fall under different protections under law*) If we become aware that a child has submitted information to the company, the information is deleted immediately. We encourage parents to instruct their children, when using the internet, to never give out personal information (*their real names, addresses, or phone numbers*) without permission.

## ***Third-Party Information***

We work with third-party providers to help operate, administer, improve, understand, customize, support and market our services. Examples of this include:

- Distributing our app
- Providing our infrastructure
- Delivery Services
- Supplying of maps and locations information
- Helping us best understand how workspace providers use our services
- Marketing

*These third-party providers may provide us information about you in certain circumstances. For example; app stores may provide us reports/data that aid us in diagnosing and fixing any service issues.*

***We will never disclose your information to a third party unless consented by you in this Privacy Policy or otherwise required by law. When we share information with third-party providers, we require them to use your information in accordance with our instructions and terms (or with express permission from you).***

Here is a list of third-party service providers:

Provider	What's Shared	Purpose
ActiveCampa		
ign	Information you enter when making meeting appointment with our sales team or subscribing to blog updates newsletter	Arranging a meeting with you and delivering newsletters
Amazon Web Services	All data	Operation of server infrastructure

Amplitude	User ID	Collecting analytics for performance improvements of Product
Canny	Information you enter when submitting a feature or integration request	Customer service and feedback functions
Calendly	Information you enter when making meeting appointment with our sales team	Arranging a meeting with you
Google Firebase	Information contained in push notifications	Sending you push notifications through Services
HelpScout	Information you enter when contacting our support or chatting with us via chat function on our website	Customer service and support functions
Hellosign	Workspace Provider contact information	Signing documents with Workspace Provider
Sentry	Your email	Collecting crash and bug reports
Stripe	Workspace Provider address and payment information	Performance of a contract with Workspace Provider

*The term of retention and use of above mentioned data – as long as it is necessary for our processing purposes or until your request to remove your data.*

### **Third Party Sharing;**

The Company may share your information with third parties to fulfill a request you have made, such as signing up for an email list or requesting customer support. In addition, we may share aggregate and other information regarding services usage statistics with selected third parties.

We may share your information with third parties in connection with an investigation of fraud, intellectual property infringements, or other illegal activity or activities that may expose you or us to legal liability (as required by law enforcement or other government officials).

Information can also be shared with third parties when we have reason to believe that a disclosure is necessary to address potential or actual injury or interference with our rights, property, operations, users, or others who may be harmed/may suffer loss or damage. This also includes if we believe disclosure is necessary to; protect our rights, investigate, or enforce our policies, terms, and conditions, combat fraud and/or comply with a judicial proceeding, court order, or legal process served on the company.

In addition, your information may be disclosed to a potential or actual successor or assigned in connection with a proposed or consummated merger, acquisition, reorganization, bankruptcy, or other similar event involving all or a portion of the company, the company's customer information may be transferred to our successor or assigned.

### ***Assignment, Change of Control, and Transfer***

All of our rights and obligations under our Privacy Policy are freely assignable by us to any of our affiliates, in connection with a merger, acquisition, restructuring, sale of assets, or by operation of law or otherwise. We may transfer your information to any of our affiliates, successor entities, or new owners if needed.

### ***Managing your information***

We store data as long as it is necessary for our processing purposes or until you put in a request to remove your data. The retention period is determined on an individual basis, depending on factors such as the nature of the data, the purpose of their collection and processing, and the corresponding legal or operational needs for their storage.

***If you would like to manage, change, limit, or delete information, please contact us support@andcards.com.***

### ***Contacting our Customer Support***

You may be entitled to request to delete, restrict, correct, or receive a copy of the information collected about you. To the extent these rights apply in your country, they may be limited in some situations (*for example where we are under a legal requirement to keep certain information*). Should you wish to make a request, you may send an email to support@andcards.com. Please indicate your country of residence in your correspondence.

**Data Retention:** We will retain your information as long as it is necessary for our processing purposes, until your request to remove your data, or to administer our Services. If you request that we no longer use your personal information to provide you support, contact you or for other purposes, contact us via e-mail support@andcards.com.

We may still retain some of your information in our files for a reasonable period of time to resolve disputes, enforce our user agreement, administer our services, comply with technical and legal requirements, and/or other constraints related to the security, integrity, and operation of our services, after which we will take steps to delete or archive it.

***In all cases for all services, we will respond to your request for access to update, delete, or correct inaccuracies to your information within 30 days.***



## ***Law and Protection***

We may collect, use, preserve, and share your information if we have a good-faith belief that it is reasonably necessary to: (a) respond pursuant to applicable law or regulations, to legal process, or to government requests; (b) enforce our terms and any other applicable terms and policies, including for investigations of potential violations; (c) detect, investigate, prevent, and address fraud and other illegal activity, security, or technical issues; or (d) protect the rights, property, and safety of our users, andcards, or others. ***We may store such information for a period of at least one (1) year, if necessary.***

All disputes which may arise between you and us, in relation to this Privacy Policy, shall be finally settled by arbitration in Stockholm, Sweden, under the Law of Sweden. The award rendered by the arbitrators shall be final and binding on the parties concerned.

## ***Our Global Operations***

You agree to our information practices, including the collection, use, processing, and sharing of your information as described in this Privacy Policy, as well as the transfer and processing of your information to the Republic of Korea and other countries globally where we have or use facilities, service providers, or partners, regardless of where you use our Services. You acknowledge that the laws, regulations, and standards of the country in which your information is stored or processed may be different from those of your own country.

## ***Updates to Our Policy***

We reserve the right to make changes to this Privacy Policy. Please check back from time to time to ensure that you are aware of these changes. If we make a material change to this Privacy Policy, we will notify you here, by email, and/or by means of a notice on our home page or application homepage. As far as permitted by applicable law, your continued use of the services will signify your acceptance of these changes.

## ***Contact Us***

If you have any questions, complaints or suggestions regarding the protection of *your* information, please contact our Chief Privacy Officer (Information Data Protection Manager). We will use our best efforts to provide you with a timely and satisfactory response.

### ***EMBASSY HOUSE:***

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### ***ANDCARDS:***

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