

# Privacy Policy

## Sonder Associates



## Data Protection Information Notice

### 1. Introduction

- 1.1. In this notice, “we”, “us” and “our” refer to Sonder London Ltd, a company incorporated in England and Wales (company number 11661801) with its registered office at Sonder Associates Ltd, Sycamore House, 5 Sycamore St, London, EC1Y 0SG.
- 1.2. We are committed to safeguarding the privacy of all individuals whose personal data we store and process; in this notice we explain how we will handle your personal data.
- 1.3. This notice applies where we are acting as a data controller with respect to your personal data; in other words, where we determine the purposes and means of the processing of that personal data.

### 2. How we use your personal data

2.1. In this section we have set out:

2.1.1. The general categories of personal data that we may process.

2.1.2. In the case of personal data that we did not obtain directly from you, the source and specific categories of that data.

2.1.3. The purposes for which we may process personal data.

2.1.4. The legal bases of the processing.

2.2. We may process your account data (“account data”). The account data may include your name, postal address, telephone number and email address. The source of the account data is you or your employer. The account data may be processed for the purposes of providing our services, ensuring the security of our services, maintaining back-ups of our databases and communicating with you.

2.3. 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.

2.4. We may process your personal data that are provided in the course of the use of our services (“service data”). The source of the service data is you or your employer. The service data may be

processed for the purposes of providing our services, ensuring the security of our services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is our legitimate interests, namely the proper administration of our business and provision of legal services relevant to your field of professional interest.

- 2.5. We may process information relating to transactions, including purchases of goods and services that you enter into with us (“transaction data”). The transaction data may include your contact details, your card details 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.
- 2.6. 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 provision of legal services relevant to your field of professional interest.
- 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 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 provision of legal services relevant to your field of professional interest.
- 2.8. We may process information contained in or relating to any communication that you send to us (“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 and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our business and provision of legal services relevant to your field of professional interest.
- 2.9. We may process data relating to your clients and employees. This data may include their contact details, their card details and their transaction details. The source of this data is as provided by you. This data may be processed for the provision of services, as set out in our contract with you.

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.

2.10. We may process any of your personal data identified in this notice where necessary for the establishment, exercise or defence 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.

2.11. We may process any of your personal data identified in this notice 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.

2.12. In addition to the specific purposes for which we may process your personal data set out in this section, 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.

2.13. Please do not supply any other person's personal data to us, unless we prompt you to do so.

### 3. Providing your personal data to others

3.1. 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 defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.2. We may disclose all areas of personal data set out in section 2 above to our suppliers or subcontractors insofar as reasonably necessary for 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 provision of legal services relevant to your field of professional interest.

3.3. In addition to the specific disclosures of personal data set out in this section, 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 defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### 4. Retaining and deleting personal data

4.1. This section sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

4.2. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

4.3. We will retain your personal data for a minimum period of 1 year and for a maximum period of 7 years following 25 May 2018.

4.4. Service data will be retained for a minimum period of 1 year and for a maximum period of 10 years following 25 May 2018.

4.5. Transaction, notification and correspondence data will be retained for a minimum period of 1 year and for a maximum period of 10 years following 25 May 2018.

4.6. In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases the period of retention of all categories of data will be determined based on reasonable need and the legitimate interest on which the data is being held.

4.7. Notwithstanding the other provisions of this section, we may retain your personal data where such retention 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.

#### 5. Security of personal data

- 5.1. We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.
- 5.2. We will store all your personal data on secure servers, personal computers and mobile devices, and in secure manual record-keeping systems.
- 5.3. You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 5.4. You should ensure that your passwords used to access our software and IT systems are not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the passwords confidential and we will not ask you for your passwords (except when you log in to our software and IT systems).

## 6. Amendments

- 6.1. We will publish changes to this notice on our website at: [www.sonderassociates.com](http://www.sonderassociates.com)
- 6.2. We will notify you of any changes to this notice which may affect you by e-mail or post.

## 7. Your rights

7.1. In this section, we have summarised 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:

- 7.2.1. The right to access.
- 7.2.2. The right to rectification.
- 7.2.3. The right to erasure.
- 7.2.4. The right to restrict processing.

- 7.2.5. The right to object to processing.
- 7.2.6. The right to data portability.
- 7.2.7. The right to complain to a supervisory authority.
- 7.2.8. 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 defence 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 defence of legal claims; and you have objected to processing, pending the verification of that objection.

7.7. 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

defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

7.8. 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 defence of legal claims.

7.9. 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.

7.10. 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.

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

7.11.1. Consent; or

7.11.2. 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.

7.12. 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.

7.13. 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.

7.14. You may exercise any of your rights in relation to your personal data by written notice to us, in addition to the other methods specified in this section.

## 8. Our details

8.1. Our full legal name is Sonder London Ltd.

8.2. We are registered in England and Wales under registration number 11661801, and our registered office is at Sonder Associates Ltd, 3rd Floor, Sycamore House, 5 Sycamore St, London, EC1Y 0SG

8.3. Our principal place of business is at Sonder Associates Ltd, 3rd Floor, Sycamore House, 5 Sycamore St, London, EC1Y 0SG

8.4. You can contact us:

8.4.1. By post, at the postal address above.

8.4.2. Using our website contact form at: [www.sonderassociates.com/04-contact](http://www.sonderassociates.com/04-contact)

8.4.3. By telephone, on +44 (0) 7 515557901

8.4.4. By email, on [team@sonderassociates.com](mailto:team@sonderassociates.com)

