

SOMEROOM Privacy Policy

SOMEROOM Limited ("We") are committed to protecting and respecting your privacy and seek to ensure the highest standards of compliance with UK Data Protection Laws and Regulations. SOMEROOM Ltd has an up-to-date data protection notification registered with the Office of the Information Commissioner.

This policy (together with our terms and conditions of use [INSERT AS LINK TO TERMS & CONDITIONS OF USE] and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.someroom.com (our site), registering or otherwise using the information and services provided on our site, you are accepting and consenting to the practices described in this policy.

WHAT DO WE MEAN BY “YOUR DATA”?

This means any information about you which is personally identifiable, including, without limitation, your name, address, date of birth, telephone numbers, email address, user name, password, comments, personal descriptions, photos and other information from which you can be identified and which you may disclose to us or otherwise via our site at any time.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register for an account on our site, subscribe to any subscription services we choose to offer, search for a product or service, participate in discussion boards, community forums or other interactive functions on our site, complete optional surveys or feedback forms, report a problem with our site, and any other activities you may carry out on our site. The information you give us may include your name, mailing address, email address, username, password, phone number, PayPal details (where appropriate), details relating to any property you advertise or seek (including but not limited to its location and address, property type, price availability, photos, video footage, and a description of the space), and other information you may choose to provide us with. The information in relation to properties you advertise or seek may be visible to other SOMEROOM website users and the general public subject to the privacy choices you make within your account settings. You may edit certain information about you or properties you post via your account and may choose to limit who is able to view content you post.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products or services you viewed or searched for, opportunities, website and resources you visited, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from other sources.** We may receive information about you if you use any other websites we may operate or any other services we may provide from time to time. We also work closely with third parties (including, for example, business partners, sub-contractors in technical and payment services, advertising networks, analytics providers, search information providers) and may receive information about you from them.

COOKIES

Our website uses cookies to distinguish you from other users of our website. Cookies are small text files that we store on your browser or the hard drive of your computer or mobile device if you agree. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy [INSERT AS LINK].

USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- **Information you give to us.** We may use this information:
 - to provide and improve our service, complete your transactions, address your enquiries, process your registration, verify the information you provide is valid, process and deal with any enquiries or complaints made by or about you, and for compliance and internal business purposes;
 - to automatically filter and show you relevant properties and keep you updated with information by email about existing and new SOMEROOM services that we think may be of interest to you;
 - to notify you about changes to our service;
 - to ensure that content from our site is presented in the most effective manner for you and for your computer; and
 - to monitor and investigate any suspect breach of our terms and conditions of use made by or otherwise relating to you, to enforce and comply with the law, protect the property and rights of SOMEROOM Limited or any third party, or to prevent

or stop activity we may consider to be, or to pose a risk of being, illegal, fraudulent or unethical.

We reserve the right to send you certain communications, such as service announcements and administrative messages and other communications relating to the SOMEROOM service, without offering you the opportunity to opt out of receiving them.

- **Information we collect about you.** We will use this information:
 - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
 - to allow you to participate in any interactive features of our service, when you choose to do so;
 - as part of our efforts to keep our site safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

We understand how frustrating it can be to receive unwanted spam. For this reason, if you are already registered, we will only contact you electronically about properties (or related products or services) which are similar to those previously booked by you. If you are a new registrant, you will only be contacted if you agree to it. If you don't want to be contacted for marketing purposes, please tick the relevant box that you will find on screen.

DISCLOSURE OF YOUR INFORMATION

We may share your information with selected third parties including:

- Employees, agents, third party business partners and service providers, to administer and facilitate the provision of our site and our current or future services, and to perform service-related facilities and assistance (including, without limitation, maintenance and payment processing). Where we use a technical partner to conduct some processing and storing of your data on our behalf in providing our services via our site, this is always subject to strict contractual control.
- Advertisers and advertising networks that require data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help

advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If SOMEROOM Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of use [INSERT AS LINK TO TERMS & CONDITIONS OF USE] and other agreements; or to protect the rights, property, or safety of SOMEROOM Limited, our customers, or others.

Always think carefully before disclosing your data or other information to other site users or otherwise posting your data on our site. Please be aware that any of your data or other information which you choose to disclose on our site may then be viewed and even used by other users. We do not control the contents of communications made between users.

You must respect the privacy of others and you should not disclose any personal details about other people that may be misleading or cause them harm or offence. It is your responsibility to obtain their prior permission in respect of any mention of them where relevant.

WEBSITE LINKS

Our site may also, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that they may have their own privacy policies. We do not accept any responsibility or liability for these policies or for the security of these linked sites. Please check these policies before you submit any personal data to these websites.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your booking, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be processed securely using technological measures imposed by PayPal. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password and any other login details confidential and you agree not to share them with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking the relevant boxes on our forms and emails. You can also exercise the right at any time by contacting us at daniel@someroom.com.

ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee (currently £10) to meet our costs in providing you with details of the information we hold about you.

CHANGES TO OUR PRIVACY POLICY

We reserve the right to modify or supplement this Privacy Policy at any time. Any changes we may make to our Privacy Policy in the future will be posted on this page. Where such changes affect the purposes for which your data is collected, we will also notify you by email. Please check back frequently to see any updates or changes to our Privacy Policy. Your continued use of our site after we post any changes or send you any such email notification will constitute your acceptance of the new terms.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to daniel@someroom.com or [INSERT OFFICE ADDRESS].