

Privacy Policy

We are delighted that you have chosen to visit our website. We take our data protection responsibilities with the utmost seriousness and we have designed our website so that you may navigate and use our website without having to provide Personal Data.

This Policy sets out what Personal Data we collect, how we process it and how long we retain it. This Policy is applying to all of our processing activities where we act as a data controller.

In this policy, "we", "us" and "our" refers to Full Node GmbH & Co OHG a company incorporated in Germany with its registered address at Skalitzer Straße 85-86, 10997 Berlin , Germany. For more information about us, see the **Our details** section of this policy.

In this Policy, "personal data" means any information relating to you as an identified or identifiable natural person ("Data Subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

In this Policy, "processing" means any operation or set of operations which is performed on personal data (as defined in this Privacy Policy) or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

1. Navigating this Policy

If you are viewing this policy online, you can click on the below links to jump to the relevant section:

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2. How We Use Personal Data

2.1. When subscribing to our Newsletter

We may collect and process the Personal Data that you provide to us for the purpose of subscribing to our email newsletter. This data may include:

- i. your email address;
- ii. the date and time of registration;
- iii. your IP address.

This data is collected and processed for the purpose of sending you our newsletter.

The legal basis for this processing is your consent as provided in the double opt-in confirmation part of our newsletter sign-up process.

Your email address will be stored as long we have the consent to send you a newsletter.

2.2. When receiving our Newsletter

If you have subscribed to our newsletter, each time you receive a newsletter from us, we may collect and process Personal Data. This data may include:

- i. the date and time you opened the email;
- ii. what (if any) links or URLs you accessed from our newsletter;
- iii. the location it was accessed from

This data is collected and processed for the purpose of improving the content of our newsletter.

The legal basis for this processing is your consent as provided in the double opt-in confirmation part of our newsletter sign-up process and is our legitimate business interests, namely monitoring and improving our newsletter.

2.3. When applying as a member

When applying for a membership at Full Node, you are asked to provide Personal Data. This may include:

- i. your name;
- ii. your email;
- iii. your telephone number;
- iv. your company website;
- v. your LinkedIn profile; and
- vi. your relationship to other office members.

This data is collected and processed for the purpose of evaluating all applicants and communicating with them. The legal basis for this processing is that it is necessary prior to entering into a contract and thereafter to fulfil a contract with you.

The data will be kept until the applicant was rejected or approved. For approved applicants please refer to the next section.

2.4. When becoming a member

When becoming a member of the Full Node co-working space, we need the following information from you:

- i. your name;
- ii. your email;
- iii. your company phone number;
- iv. your company address; and
- v. bank account information.

The data is used and processed in order to onboard members and manage their memberships.

The legal basis for this processing is that it is necessary to fulfil a contract with you.

We will store the data as long as you are a member of Full Node and as long as needed to comply with legal regulations.

2.5. Other uses of your Personal Data

We may process any of your Personal Data where it is necessary to establish, exercise, or defend legal claims. 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.

Further, we may process your Personal data where such processing is necessary in order for us to comply with a legal obligation to which we are subject. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights.

3. Use of Third Party Applications

We use the following third party applications:

3.1. Betahaus

Betahaus is managing the co-working space. They are responsible for membership administration, and they are the contact person for any Full Node related questions and postal administrations. Betahaus collects the member data as described in 2.5

For more information on betahaus please visit <https://www.betahaus.com/>

3.2. Cobot

The Cobot software is used to manage memberships and room reservations of Full Node. Cobot stores the member data as described in section 2.5. Full Node member will be onboarded to Cobot when contracting with the Full Node

We do not store any information collected by Cobot. Cobot privacy policy is available at <https://www.cobot.me/privacy-policy>

For more information on Cobot, please visit: <https://www.cobot.me/>

3.3. MailChimp

We use MailChimp to send out newsletters to subscribers. MailChimp allows us to prepare customized Emails and manage our subscribers.

We do not store any information collected by MailChimp. MailChimp's privacy policy is available at <https://mailchimp.com/legal/privacy/>.

MailChimp's purpose and function is further explained under the following Link <https://mailchimp.com/>

3.4. Formspree

Formspree is a tool to easily add forms to static HTML pages. We use Formspree to set up the application form for the Full Node membership and receive the application information through direct submission by the applicant.

For further information and the applicable data protection provisions of Formspree, please visit <https://formspree.io/static/PrivacyPolicy.pdf>

Formspree's purpose and function is further explained at the following link <https://formspree.io/>

3.5. Transmitting Social Media Links

At the end of our website we link to our social media profiles. Those services might also collect Personal Data. Please refer to their privacy policies for more information.

Slack channel: <https://slack.com/privacy-policy>

Facebook: <https://www.facebook.com/policy.php>

Twitter: <https://twitter.com/de/privacy>

Instagram: <https://help.instagram.com/155833707900388>

4. Sharing Your Personal Data

We may pass your information to our Business Partners, administration centres, third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing our services to you.

In addition, when we use any other third-party service providers, we will disclose only the personal information that is necessary to deliver the service required and we will ensure, via contractual obligations that these require them to keep your information secure and not to use it for their own direct marketing purposes.

In addition, we may transfer your personal information to a third party as part of a sale of some, or all, of our business and assets or as part of any business restructuring or reorganisation, or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation. However, we will take steps to ensure that your privacy rights continue to be protected.

5. Transferring Your data outside of the EU

The distribution of our newsletter is realized with MailChimp, which is based in the US. MailChimp is certified under the EU-US Privacy Shield.

6. Existence of Automated Decision-making

We do not use automatic decision-making or profiling when processing Personal Data.

7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Your Rights as a Data Subject

You have certain rights under applicable legislation, and in particular under Regulation EU 2016/679 (General Data Protection Regulation or 'GDPR'). We explain these below. You can find out more about the GDPR and your rights by accessing the [European Commission's website](#).

Right Information and access

You have a right to be informed about the processing of your personal data (and if you did not give it to us, information as to the source) and this Privacy Policy intends to provide the information. Of course, if you have any further questions you can contact us on the above details.

Right to rectification

You have the right to have any inaccurate personal information about you rectified and to have any incomplete personal information about you completed. You may also request that we restrict the processing of that information.

The accuracy of your information is important to us. If you do not want us to use your Personal Information in the manner set out in this Privacy Policy, or need to advise us of any changes to your personal information, or would like any more information about the way in which we collect and use your Personal Information, please contact us at the above details.

Right to erasure (right to be 'forgotten')

You have the general right to request the erasure of your personal information in the following circumstances:

- the personal information is no longer necessary for the purpose for which it was collected;
- you withdraw your consent to consent based processing and no other legal justification for processing applies;
- you object to processing for direct marketing purposes;
- we unlawfully processed your personal information; and
- erasure is required to comply with a legal obligation that applies to us.

We will proceed to comply with an erasure request without delay unless continued retention is necessary for:

- Exercising the right of freedom of expression and information;
- Complying with a legal obligation under EU or other applicable law;
- The performance of a task carried out in the public interest;
- Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances; and/or
- The establishment, exercise, or defence of legal claims.

Right to restrict processing and right to object to processing

You have a right to restrict processing of your personal information, such as where:

- you contest the accuracy of the personal information;
- where processing is unlawful you may request, instead of requesting erasure, that we restrict the use of the unlawfully processed personal information;
- we no longer need to process your personal information but need to retain your information for the establishment, exercise, or defence of legal claims.

You also have the right to object to processing of your personal information under certain circumstances, such as where the processing is based on your consent and you withdraw that consent. This may impact the services we can provide and we will explain this to you if you decide to exercise this right.

Right to data portability

Where the legal basis for our processing is your consent or 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, you have a right to receive the personal information you provided to us in a structured, commonly used and machine-readable format, or ask us to send it to another person.

Right to freedom from automated decision-making

As explained above, we do not use automated decision-making, but where any automated decision-making takes place, you have the right in this case to express your point of view and to contest the decision, as well as request that decisions based on automated processing concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers.

Right to object to direct marketing ('opting out')

You have a choice about whether or not you wish to receive information from us.

We will not contact you for marketing purposes unless:

- you have a business relationship with us, and we rely on our legitimate interests as the lawful basis for processing (as described above)
- you have otherwise given your prior consent (such as when you download one of our guides)

You can change your marketing preferences at any time by contacting us on the above details. On each and every marketing communication, we will always provide the option for you to exercise your right to object to the processing of your personal data for marketing purposes (known as 'opting-out') by clicking on the 'unsubscribe' button on our marketing emails or choosing a similar opt-out option on any forms we use to collect your data. You may also opt-out at any time by contacting us on the below details.

Please note that any administrative or service-related communications (to offer our services, or notify you of an update to this Privacy Policy or applicable terms of business, etc.) will solely be directed at our clients or business partners, and such communications generally do not offer an option to unsubscribe as they are necessary to provide the services requested. Therefore, please be aware that your ability to opt-out from receiving marketing and promotional materials does not change our right to contact you regarding your use of our website or as part of a contractual relationship we may have with you.

Right to request access

You also have a right to access information we hold about you. We are happy to provide you with details of your Personal Information that we hold or process. To protect your personal information, we follow set storage and disclosure procedures, which mean that we will require proof of identity from you prior to disclosing such information. You can exercise this right at any time by contacting us on the above details.

Right to withdraw consent

Where the legal basis for processing your personal information is your consent, you have the right to withdraw that consent at any time by contacting us on the above details.

Raising a complaint about how we have handled your personal data

If you wish to raise a complaint on how we have handled your personal data, you can contact us as set out above and we will then investigate the matter.

Right to lodge a complaint with a relevant supervisory authority

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Data Protection Commissioner under the Data Protection Act which is Berliner Beauftragte für Datenschutz und Informationsfreiheit:

Berliner Beauftragte für Datenschutz und Informationsfreiheit
Friedrichstr. 219
Guest entrance: Puttkamerstr. 16 – 18 (5th floor)

Phone: 030 13889-0

Fax: 030 2155050

Email: mailbox@datenschutz-berlin.de

You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence, place of work, or the place where you allege an infringement of one or more of our rights has taken place, if that is based in the EEA.

9. Storing Personal Data

We retain your information only for as long as is necessary for the purposes for which we process the information as set out in this policy.

However, we may retain your Personal Data for a longer period of time 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.

10. Changes to this Privacy Policy

We may make changes to this Policy from time to time. Where we do so, we will notify those who have a business relationship with us or who are subscribed to our emailing lists directly of the changes and change the 'Last updated' date above. We encourage you to review the Policy whenever you access or use our website to stay informed about our information practices and the choices available to you. If you do not agree to the revised Policy, you should discontinue your use of this website.

11. Our details

This website is owned and operated by Full Node GmbH & Co OHG. We are registered in Germany under registration number HRA 54851 B.

You can contact us via:
Full Node GmbH & Co OHG
Skalitzer Straße 85-86
10997 Berlin

If you have any queries concerning your rights under this Privacy Policy, please contact us via:

Email: dataprotection@fullnode.berlin