

# Havn Spaces Privacy Policy

## Introduction

Havn Spaces, LLC (“**Havn**,” “**we**,” “**us**,” or “**our**”) operates U.S.-based coworking spaces and associated services, including space booking platforms, high-speed WiFi, on-site security systems, biometric access controls, guest registration kiosks, and mobile/web applications. We are committed to maintaining your trust by protecting your personal information. This Privacy Policy (“**Policy**”) describes how we collect, use, share, and safeguard your personal data when you interact with our websites (e.g. **joinhavn.com**), mobile apps, and physical Havn Spaces locations, and it explains the choices and rights you may have regarding your information. This Policy applies to all users of Havn services, including members, guests/visitors, and others who provide personal data to us.

**Scope:** This Policy covers personal data handled by Havn in connection with our coworking and member club services. It does not apply to third-party websites, services, or applications that you may access through our services (for example, independent payment processors or visitor check-in platforms not controlled by Havn); such third parties are governed by their own privacy policies, and we encourage you to review those policies separately. By using our services, you acknowledge that you have read and understood this Privacy Policy and agree to its terms. Our services are intended for U.S. users and are not directed to children under 13, as described below. We reserve the right to update this Policy as needed and will indicate the date of the latest revision at the top.

## Personal Information We Collect

We collect various categories of personal information about you (and, if you are a member company arranging services for your employees, about your end users) in order to operate our business and provide our coworking and related services. The types of personal data we collect include:

- **Contact Identifiers:** Information that identifies you or allows us to get in touch with you, such as your full name, email address, telephone number, postal address, and company or organization name and role/title.
- **Government ID and Verification Data:** Information used to verify your identity or meet legal requirements, such as your date of birth, photograph, and government-issued identification numbers or documents (e.g. driver's license, state ID, or passport). This may also include biometric identifiers or information (such as fingerprints or facial recognition data) used for access control or identity verification, where you have opted to use biometric entry systems or photo-based identification. We collect this data to authenticate users and protect against fraud.
- **Account Credentials:** If you register an account with Havn (for example, on our mobile app or member portal), we collect login credentials like username and password, which you use to access your account.
- **Payment and Financial Information:** Information needed to process payments for our services. This includes your billing address, credit or debit card number or other payment card details, bank account information, and transaction history (e.g. payments for memberships, space bookings, or event tickets). We may also retain limited details of your transactions with us (such as amounts and dates) for record-keeping and finance purposes. **Note:** Havn uses third-party payment processors to handle your payment information; we generally do not store full card numbers ourselves, but the necessary data will be collected and processed by the payment provider on our behalf (see "Data Sharing" below).
- **Access and Usage Information:** Data about how, when, and where you access our spaces and use our services. This includes keycard or keypad entry logs (dates and times you swiped into a facility or specific room), door access records, elevator or turnstile logs, and conference room or desk booking reservations. We record your check-ins, check-outs, and the Havn locations or areas you access to maintain security and manage your membership (for example, to track meeting room usage or after-hours entry). We also maintain records of the services and amenities you utilize – such as events you RSVP to or attend, equipment or lockers you use, and any classes or wellness facilities (if applicable) you check into – in order to administer these services and improve your experience.

- **Device and Network Information:** When you use Havn’s technology services (for example, connecting to our on-site WiFi networks or using our mobile app or website), we automatically collect certain device and usage data. This includes device identifiers and Internet/network activity data like your device type, operating system, browser type, **IP address**, **MAC address** or other unique device IDs, and **WiFi session** information (e.g. when your device connects and disconnects, and potentially the bandwidth used or general domains accessed over our network). If you use our mobile app, we may also collect **geolocation data** (precise location from GPS, WiFi, or Bluetooth) **with your permission**, for example to enable location-based access features or to help you find nearby Havn locations. We might also collect information about your mobile device’s contacts or calendar **with your consent**, such as if you opt to sync your contacts to send coworking space invites or connect with colleagues (you can always decline or revoke such access in your device settings). This device and network information helps us administer our IT systems, secure our networks, and understand how our digital services are used.
- **Surveillance and Security Data:** To ensure the safety and security of our spaces, Havn locations are monitored by video cameras (CCTV) and other security measures. We may collect **visual or audio recordings** of individuals within common areas of our premises through these surveillance systems. This includes video footage or images of you (and possibly sound recordings in certain areas) captured by our CCTV cameras, as well as electronic access logs as described above. We use these security measures to protect our members, guests, property, and confidential information. In addition, if you are involved in a security incident, accident, or other reportable event at our locations, we will collect information related to that incident (e.g. incident reports, witness statements, relevant photos or footage) as part of our safety and security protocols.
- **Visitor and Guest Information:** If you visit a Havn Spaces location as a **guest or visitor** (for example, to meet a member or attend an event), we will collect personal information about you for security and check-in purposes. This typically includes your name, contact information (such as phone number or email), the date/time of your visit, the name of the member or host you are visiting, and any credentials issued to you (e.g. a guest badge or QR code). We may also request to

see or scan a government ID for identity verification in certain cases (for instance, if required by building security) and capture your image (for example, via a lobby camera or a photo taken for a visitor badge). Visitor data is used strictly to manage guest access, maintain security logs, and comply with any building requirements for guest registration.

- **Communications and Content:** We collect the content of communications you send to us or through our platforms. For example, if you fill out a form on our website, contact us via email or chat, call customer support, or otherwise correspond with us, we will collect your name, contact details and the time and content of your message. If you use any community features we provide (such as member forums, in-app chat, or event message boards), any information you post or submit (including profiles, comments, photos, or other media) will be collected and potentially visible to other participants depending on the settings. We also collect any feedback, testimonials, or survey responses you provide, as well as records of your marketing preferences (e.g. if you subscribe or unsubscribe from our newsletters).
- **Other Information You Provide Voluntarily:** You may choose to provide other personal information to us in the course of using our services. For example, during community events or programs, you might share details about your interests or dietary restrictions (if catering is provided), or you might submit a profile picture or social media handle to personalize your member profile. We will collect whatever information you choose to share with us and treat it in accordance with this Policy. Unless specifically requested by us (for a defined purpose) we ask that you **not** provide any sensitive personal information that is not needed – for instance, please avoid sending us data about your health, biometric or genetic data (beyond those we specifically request for access purposes), or other sensitive details unless it is necessary for the services you are using. In limited cases, we may collect certain sensitive information with your explicit consent where needed for particular services – for example, we might collect health-related information if an incident occurs (such as records of an on-site injury or emergency) or if required for wellness program participation – but we will only do so in compliance with applicable laws and with appropriate safeguards.

**Sources of Data:** Most of the personal information we collect comes directly from you or your interactions with Havn services (for example, when you sign up, fill out your profile, use your keycard, or connect to our WiFi). In some cases, we may receive information about you from third parties: for instance, if your employer or another entity purchases a Havn membership for you, they might provide us your details; if a friend invites you as a guest, they may give us your name and email to send an invitation; or if we partner with a third-party check-in app or event organizer, they might forward us data you provided to them. We may also receive personal data from **service providers** and **analytics tools** we use (such as information from cookies or logs, described below), and from **public sources** or **social networks** if you engage with our social media pages. In all cases, we only collect and use data as permitted by law and as reasonably necessary to provide our services or meet our legitimate business and security needs. Personal data that has been de-identified or aggregated such that it can no longer reasonably be linked to an individual is **not** considered personal information and we may use it for any lawful purpose.

## How We Use Personal Information

We use the personal information we collect for the following business and operational purposes, in each case only as permitted by applicable law:

- **Providing and Improving Services:** We use data to provide you with the services, products, and information you request. This includes using personal information to set up and manage your membership or account, reserve workspaces or amenities for you, facilitate payments and renewals, and generally perform our contract with you (or the organization you represent). We also use data to personalize and improve our services – for example, to optimize workspace allocations, enhance network performance, or develop new features based on usage patterns.
- **Maintaining a Secure Environment:** Your information is crucial in helping us **protect against fraud, unauthorized access, or harm**, and to maintain the safety and security of our physical spaces and online systems. We monitor access logs and camera footage to ensure that only authorized individuals are entering our premises and to quickly detect or investigate any suspicious or unlawful activities. Personal data is also used to enforce our space rules and membership

terms, and to **provide a secure environment** for all members and guests. For instance, if an access credential is misused, we may use log data to disable it and investigate.

- **Customer Support and Communications:** We process personal data to **respond to your inquiries and support requests**, and to provide effective customer service. This includes using your contact information to communicate with you about bookings or account issues, to send confirmations and reminders, and to notify you about important updates (such as changes to our facilities, scheduled maintenance, or emergency alerts affecting a location). We may also use your communication history to assist you better (e.g. knowing what issues you've contacted us about before).
- **Analytics and Product Development:** We **analyze usage data and feedback** to better understand how our spaces and services are used and to make improvements. For example, we review aggregated WiFi usage and occupancy trends to optimize our space layouts and infrastructure. We may track which website pages or app features are most frequently used in order to improve user experience. This analysis helps us refine our offerings, plan new locations, and enhance the technology and amenities we provide.
- **Marketing and Promotional Communications:** With your consent or as otherwise permitted, we use contact information (such as email or mailing address) to **send you news and marketing materials** about Havn Spaces. These can include newsletters, special offers, event invitations, or other promotions that we believe may interest you as a member of our community. We strive to tailor these communications to be relevant – for instance, we might highlight new services at the location you use, or upcoming community events. You can opt-out of marketing emails at any time (see “Your Choices” below), and we will not send you promotional texts or calls without appropriate consent. (Note: Transactional and administrative communications – like billing notices or security alerts – are not considered marketing and will be sent as needed even if you opt out of promos.)
- **Facilitating Community Programs and Events:** If you sign up for Havn-hosted events, workshops, or community programs, we will use your information to register you and facilitate your participation. For example, we might use your

name and company to create event name badges, or use your email to send event materials. We may also use photos or videos from events for internal community newsletters or social media (with your consent where required). If an event is co-sponsored by Havn and an external partner, and you RSVP, we may share your name and contact details with the partner as needed for the event (see data sharing below), but we will inform you at sign-up if this is the case.

- **Processing Payments and Transactions:** We use financial and personal information to **process payments** for our services and to keep proper financial records. This includes charging membership fees, booking fees, and any purchases you make from us (such as merchandise or food/beverage, if offered). We also use data to prevent fraudulent transactions and to invoice or provide receipts to you.
- **Legal Compliance and Protection of Rights:** We may process your personal information as necessary to **comply with applicable laws, regulations, and legal obligations**. This includes maintaining records required by tax or accounting laws, conducting any required background checks (for example, if mandated for building access), and responding to lawful requests by government authorities (such as subpoenas or court orders). Furthermore, we will use and disclose personal data where needed to **assert our legal rights or defend against legal claims**, to enforce our membership agreements and Terms of Service, to collect overdue fees, to prevent fraud, and to protect our rights, property, and the safety of our members, visitors, and the public. For instance, if necessary, we might use access logs or video evidence to address a violation of our terms or to cooperate with law enforcement in an investigation.

We will not use your personal information for purposes that are incompatible with those listed above without notifying you and obtaining your consent when required. We do **not** use personal data to make automated decisions that have legal or similarly significant effects on you without human review – for example, we do not use algorithms to terminate access or deny services without human involvement. Any new purposes for processing your data will be communicated to you through an updated version of this Policy or a separate notice, as appropriate.

## Legal Bases for Collection (U.S. Context)

Under U.S. law, businesses are generally permitted to collect and use personal information for legitimate business purposes, so long as they provide proper notice and adhere to applicable regulations. Havn Spaces collects and processes personal data only as allowed by law and in a manner consistent with your expectations in using our services. In practice, this means we rely on the following legal grounds for processing your information:

- **Contractual Necessity:** Much of our data processing is done so that we can **fulfill our contract** with you (or your organization). For example, when you sign up for a membership or book a workspace, we must collect and use your information to provide the service, grant you access to our facilities, process payments, and otherwise carry out the agreement. We cannot provide the requested services without this data.
- **Legitimate Business Interests:** We also process personal data as needed for **our legitimate interests** in operating an effective, safe, and innovative coworking business. This includes uses related to securing our premises and networks, improving our offerings, preventing fraud, protecting our legal rights, and communicating with you about relevant products or services. We consider these interests to be balanced with individual privacy rights, and we do not use your data for activities where our interests are outweighed by the impact on your privacy. For instance, it is in our legitimate interest to monitor building access for security **and** it benefits all members' safety; we perform such monitoring in a way that is minimally intrusive and respectful of privacy.
- **Legal Obligations:** Some processing is necessary for **compliance with our legal obligations**. We may be required by law to retain certain records, verify identities in some transactions, honor opt-out requests under privacy laws, or disclose information to authorities under specific circumstances. In such cases, the law provides the basis for our handling of your data.
- **Consent (when applicable):** In limited situations, we rely on your **consent** to process personal information – typically for optional or sensitive data. For example, we would obtain your consent to collect biometric identifiers for access (where required by law), or to send you marketing emails if you are not an existing

customer. If we ask for consent, you have the right to withdraw it at any time, and we will cease the processing for which consent was obtained. Note that withdrawing consent will not affect uses that occurred before the withdrawal, and there may be cases where we have another legal basis to continue processing your data (for example, we might still have to retain certain information for legal reasons).

By providing your personal information to Havn Spaces or using our services, you acknowledge that your information will be processed for the above-described purposes. If you have questions about the legal basis upon which we collect or use any specific type of data, feel free to contact us (see “Contact Us” section below).

## How We Share Your Information

We value your privacy and consider the protection of your personal data a vital part of our relationship with you. **We do not sell your personal information** to third parties for profit. However, in the normal course of running our business, we do share personal data with certain third parties for the purposes outlined in this Policy. All such sharing is done under contractual and legal safeguards to ensure your data is protected. The categories of third parties with whom we may share information (and the reasons for sharing) include:

- **Service Providers and Vendors:** We employ trusted third-party companies and individuals to perform functions on our behalf and help deliver our services. These **service providers** include, for example: **payment processors** (to process credit card transactions securely), **IT and cloud hosting providers** (to store data or support our website/app), **email and SMS delivery services** (to send communications), **visitor management and access control system providers** (for managing guest check-ins or digital badges), **WiFi network operators, analytics and software tools providers, and customer support platforms.** We share the personal information necessary for these providers to perform their work – for instance, we might share your name and email with an email delivery service to send a newsletter, or your card details to a payment gateway to charge your membership fee. These service providers are contractually obligated to use

personal data only to provide services to us and not for their own unrelated purposes.

- **Affiliates and Related Entities:** Havn Spaces, LLC may share personal information with our corporate affiliates, subsidiaries, **owners**, and operators of Havn-branded locations (if any) in order to facilitate a seamless service. For example, if Havn Spaces expands and there are multiple entities operating in different cities, we may share your membership details with a Havn affiliate that runs a location you intend to visit so that they recognize you as a member. All Havn affiliates receiving your data will honor the commitments in this Privacy Policy. Similarly, if certain Havn locations are owned or managed by partner companies (e.g. a franchise or joint venture), we may share necessary information with those owners/operators so they can operate that location and provide services to you, under equivalent privacy protections.
- **Member Companies / Organizational Accounts:** If your Havn membership or usage is provided by or linked to a third party (for example, your employer, a school, or another organization that arranges access for you), we may share certain information about your use of our services with that organization. For instance, if your employer pays for your membership, we might provide them with usage reports such as the dates you checked in, conference room booking summaries, or invoice details for accounting. We share this information to the extent it is the **account holder's legitimate interest** (e.g. verifying that the service is being used in accordance with their agreement and for their internal billing reconciliation). In doing so, we will not disclose more detail than necessary – typically just usage and engagement information, not the content of your private communications or similar sensitive details.
- **Landlords and Building Management:** Havn often operates within larger buildings or campuses which may have their own security and entry systems. In some cases, we must coordinate with the **landlord, property owner, or building management** to grant you building access or comply with building-wide safety measures. We may share limited personal data with building management as needed, such as your name and authorized access level (to add you to a building's security list), or information about an incident if one occurs that involves building security. We share this information **only as necessary to fulfill**

**our lease obligations and to support building security and operations.** For example, if a fire drill or emergency occurs, we might confirm to the building's safety team which Havn members were present, so everyone can be accounted for. Any landlords or building managers with whom we share data are expected to use it solely for security or facilities management purposes.

- **Event Hosts or Sponsors:** If Havn co-hosts an event, conference, or program with an external partner (such as a networking event sponsored by another company), and you choose to register or attend, we may share your registration details with the event **organizers or sponsors** as needed for event administration. Typically, this would include your name, contact information, and company/affiliation, and only for uses related to the event (such as verifying your ticket or sending post-event materials). We will inform you at the time of registration if an external sponsor will receive your info, and you will often have the chance to opt-out of certain sharing. We do **not** sell attendee lists, but if an event partner will receive your info for their own marketing, we will either obtain your consent or ensure you have the opportunity to decline such communications.
- **Analytics and Advertising Partners:** As is common for companies operating online, we use third-party analytics tools and advertising networks that may **collect information through our website/app via cookies or similar technologies**. We may share (or permit these partners to collect) certain Device and Network Information (described above) for purposes of analytics, usage measurement, and **targeted advertising**. For example, we use Google Analytics to understand website traffic, and we may work with advertising partners (like Google Ads or social media platforms) to show Havn ads on other websites. These partners may receive data such as cookie identifiers, IP address, and information about your activity on our site, which can help them *tailor ads or measure ad effectiveness*. Any personal data shared for targeted advertising purposes is typically limited to pseudonymous identifiers and device data (not your name or sensitive details). You can opt out of most third-party ad tracking as described in the Cookies section of this Policy and via industry opt-out sites. (See **Cookies & Tracking** below for more details.)
- **Professional Advisors:** We may share personal information with our professional advisors – such as our attorneys, accountants, auditors, insurers, and other

consultants – **as necessary to fulfill our business obligations or protect our rights**. For instance, our accountants might see transaction records that include personal data when performing audits, or our legal counsel might need to review certain information in the event of a dispute or to ensure compliance with regulations. These professionals are bound to confidentiality and are only allowed to use the data for the specific services they provide to us.

- **Business Transfers:** If Havn Spaces is involved in a potential or actual **merger, acquisition, financing, reorganization, bankruptcy, or sale of company assets**, personal information may be disclosed to third parties (like prospective or actual acquiring entities and their advisors) as part of the transaction due diligence or execution. We will ensure any such sharing is subject to appropriate confidentiality protections. If another company acquires Havn Spaces or its assets, your personal information will ordinarily transfer to that company as part of the business transfer so that the services can continue to be provided. The new owner will be required to handle your information in accordance with this Privacy Policy (unless you're notified of changes).
- **Legal and Safety Disclosures:** We may disclose personal information to third parties when we believe, in good faith, that such disclosure is necessary to **comply with the law** or an enforceable governmental request, **protect our rights or the safety of others**, or **investigate fraud or security issues**. This includes:
  - **Law enforcement, Regulators, and Government Agencies:** We will cooperate with lawful requests for information if we receive, for example, a court order, subpoena, or law enforcement inquiry requiring us to share data. We may also report information to law enforcement or authorities if we believe someone has violated the law or poses a risk to public safety.
  - **Litigation and Legal Claims:** If we are involved in a legal dispute or legal process (e.g. a lawsuit or arbitration), we may need to preserve or produce relevant personal data as evidence, in accordance with legal requirements.
  - **Emergency Situations:** In rare cases, we might share information to respond to an immediate threat to someone's health or safety. For instance, we could provide a guest list to medical responders in the event of an emergency evacuation, or share known allergy information of an individual if they have a medical crisis on-site and cannot communicate.

**No Third-Party Marketing Use:** We do not share your personal data with unaffiliated third parties for their own direct marketing purposes unless we have your explicit consent to do so. In other words, you won't suddenly get marketing emails from companies you've never interacted with just because you provided data to Havn. Any exceptions (if we ever offer a program with a partner that involves such sharing) will be communicated to you so you can make an informed choice.

**Aggregated or De-Identified Data:** We may share information that has been aggregated (combined with other data) or de-identified (stripped of personal identifiers) in such a way that it cannot reasonably be used to identify an individual. For example, we might share statistics about the occupancy rates of our spaces, or the percentage of members from different industries, with prospective investors or partners. Such information is not considered personal data and may be disclosed freely.

If you have questions about third parties that may have access to your data, feel free to contact us. We can provide further information about our service providers and partners upon request. We also commit that whenever we share personal information with third parties, we will do so in accordance with applicable data protection laws and require those third parties to safeguard the information and use it only for the intended purposes.

## Cookies and Tracking Technologies

Like most websites and mobile applications, our online services use **cookies** and similar tracking technologies (such as web beacons, pixels, and device identifiers) to improve your experience, understand usage, and support our marketing efforts. This section explains how we use these technologies and your choices regarding them.

**What Cookies Are:** Cookies are small text files that websites store on your device (computer, smartphone, etc.) when you visit. They serve various functions, from remembering your preferences to tracking your navigation between pages. Some cookies are set by us (first-party cookies) and others are set by external partners (third-party cookies) when you visit our site.

**Types of Cookies We Use:** Havn's website and app use cookies and similar tools for several reasons:

- **Necessary Cookies:** These are essential for the website to function correctly and securely. For example, they may keep you logged in during your session or enable features like cart functionality or user account management. You cannot opt out of necessary cookies as they are required for core operations.
- **Analytics Cookies:** We use these to collect information about how visitors use our site, so we can improve it. For instance, we utilize **Google Analytics** to gather insights such as how often users visit, which pages are most popular, how users arrive at our site (e.g. via search engine or advertisement), and how they navigate through it. Google Analytics uses cookies to collect usage data (like your IP address and device info); however, it reports to us only aggregated information and never your name or individual identity. We have configured Google Analytics in a privacy-conscious manner (for example, by anonymizing IP addresses where possible). We also may use other analytics tools to similarly monitor usage of our mobile app and online platform.
- **User Experience Cookies:** These cookies remember choices you make to provide a more personalized experience. For example, they may recall your preferred language or city, so you don't have to select it each time, or remember that you already saw a particular announcement so we don't show it again.
- **Advertising and Marketing Cookies:** Havn may partner with third-party advertising networks and social media platforms (such as Google, Facebook/Meta, LinkedIn, or others) to promote our services on other websites and to measure the effectiveness of our ads. Cookies (and similar tracking tech like pixels) from these partners may be placed when you visit our site. They collect information about your browsing activities (e.g. pages you viewed or links you clicked) and your device identifiers. This data is used to **display targeted advertisements** for Havn on other sites you visit, and to **measure ad performance** (for example, to see if someone who saw a Havn ad later became a member). We may also use cookies for **affiliate or attribution tracking**, which helps us know which marketing channel or referral led you to our site. For instance, if you found us through a certain campaign, a cookie might help attribute your sign-up to that campaign.

**Microsoft Clarity:** We partner with Microsoft Clarity, a user behavior analytics tool, to better understand how visitors interact with our website. Microsoft Clarity uses cookies

and similar technologies to capture **behavioral metrics**, such as how you scroll or click on our pages, and it can generate **heatmaps and session replays** of anonymized user interactions. This information helps us improve our website design and fix usability issues. The data captured may include mouse movements, page navigation, and basic device info, but it **does not** include sensitive personal fields (Clarity automatically scrubs or masks things like passwords or any fields we mark as containing personal data). We use Clarity insights to optimize site layout and content, and also for **debugging and analytics purposes**, such as identifying which features are most used or where users might be getting stuck. Microsoft may also use some Clarity data for its own product improvement; for more details, you can review the [Microsoft Privacy Statement] (which we link to on our site). By using our site, you agree that we and Microsoft can collect and use this analytics data to improve our services.

**Other Tracking Technologies:** We and our partners may use other technologies in addition to cookies, such as **web beacons** (small graphic images or scripts on a page or in an email that track whether you've opened it), **pixels**, and **mobile ad IDs**. These help with similar functions – for example, a beacon in an email can tell us if you opened our newsletter, which helps us gauge interest. A pixel on our site might let a social media platform know that you visited, so that platform can later include you in a custom audience for our ads.

**Your Choices:** You have several options to control or limit how cookies and similar technologies are used:

- **Browser Settings:** Most web browsers allow you to refuse new cookies, delete existing cookies, or be notified when new cookies are set. Please note that if you disable or delete cookies, some features of our website may not function properly (for example, you may have to re-enter information or your preferences might not be saved).
- **Do Not Track:** Your browser may offer a “Do Not Track” setting to signal your privacy preference to websites. However, there is currently no consensus on how “Do Not Track” should be interpreted. **At this time, we do not respond to DNT browser signals** or similar mechanisms, due to the lack of an industry standard. We continue to monitor developments around DNT. In the meantime, to opt out

of tracking, you can use the other methods described here (e.g. adjusting cookie settings or using opt-out links).

- **Analytics Opt-Out:** Google provides an opt-out browser add-on for Google Analytics (see the Google Analytics Opt-out Browser Add-on page) which you can install to prevent your data from being used by Google Analytics JavaScript on websites.
- **Advertising Industry Opt-Outs:** For third-party advertising cookies, you can use tools like the **NAI (Network Advertising Initiative) Opt-Out** or the **DAA (Digital Advertising Alliance) Consumer Choice Page**. These allow you to opt out of many participating ad networks' cookies at once (note: you may still receive generic ads after opting out, but they will not be personalized based on cookies). If you use a mobile device, you can also adjust your device settings to limit ad tracking (for example, on iOS devices, select "Limit Ad Tracking"; on Android, select "Opt out of Ads Personalization").

Please be aware that because cookies are tied to individual browsers/devices, your choices (like an opt-out) may apply only to the specific browser or device you were using. If you access our site from multiple devices or clear your cookies, you will need to set your preferences again. For more detailed information on our use of cookies and how to manage them, you may refer to our Cookie Policy (if available) or reach out to us with any questions.

## Data Retention

Havn Spaces retains personal information only for as long as necessary to fulfill the purposes for which it was collected, or to meet legal and business requirements. In practice, the retention period will vary by data type and context. We consider factors such as the nature of the data, the reason it was collected, and any relevant legal or contractual obligations in deciding how long to keep it. Generally:

- **Member Account Data:** Information related to your membership and account (contact details, profile info, transaction records, etc.) is kept for as long as you have an active relationship with us. If you cancel your membership, we may continue to retain certain data for a period of time (typically up to a few years) in

case you reactivate your account, to facilitate any pending transactions or disputes, and to comply with record-keeping laws.

- **Access Logs and Security Footage:** Keycard and entry log data is usually retained for a limited period required for security monitoring and investigations. We might retain access logs for several months up to a couple of years, depending on the sensitivity of the facility, after which they are securely deleted or anonymized. **Surveillance camera footage** is generally stored for a short duration (for example, many systems overwrite footage after 30–60 days) unless it is actively being used to investigate an incident or required by law to be kept longer. When footage is no longer needed, it is deleted or overwritten automatically.
- **WiFi and Device Logs:** Basic network logs and device information may be kept for a short period for network security and troubleshooting (often on the order of weeks). We retain these logs longer only if needed for security audits or investigations.
- **Payment and Financial Records:** We retain payment transaction records and receipts as long as required by accounting/tax laws – often **seven years** in the U.S. for financial records – since these may be needed for audits or legal compliance. However, we do not keep full credit card numbers on our systems beyond what is needed for immediate processing (unless you’ve saved your card for recurring billing, in which case it is tokenized by our payment processor).
- **Communications:** Copies of business communications (emails to support, etc.) are generally retained for at least the duration of your membership and a reasonable period thereafter (to reference past interactions if you contact us again). Recorded phone calls (if any) or chat logs might be kept for training and quality assurance, but not indefinitely – we periodically purge old support records unless needed for a specific purpose.
- **Legal Hold:** If we are under a legal obligation to preserve data (for example, due to litigation, disputes, or government investigations), we will retain the relevant information until that obligation is lifted.

In all cases, we retain personal data **for no longer than is reasonably necessary** and legally permissible. When personal information is no longer needed, we will either delete

it securely or **anonymize** it (so it can no longer be associated with you). For example, we might remove personal identifiers from usage data and keep the aggregated statistics for historical analysis, without retaining the underlying personal data. If deletion or anonymization is not feasible (for instance, if the data is stored in long-term backups), we will isolate and secure the data and prevent further active use until deletion is possible.

## Data Security

We take the security of your personal information very seriously and have implemented a variety of technical and organizational measures to protect it from unauthorized access, disclosure, alteration, and destruction. These measures include, but are not limited to:

- **Secure Facilities:** Our physical locations are secured by access control systems (as described above) to prevent unauthorized persons from entering restricted areas. We also secure any physical records (paper forms, etc.) containing personal data in locked cabinets or offices with limited access.
- **Encryption:** We use encryption to protect sensitive data in transit and at rest. For example, our website and app enforce HTTPS, which encrypts data between your browser/app and our servers. Sensitive fields (like passwords, payment details) are stored in encrypted form or tokenized by third-party providers.
- **Access Controls:** We restrict access to personal data to Havn staff and service providers who **need to know** that information for their duties. Employees are trained on confidentiality and data protection. We employ authentication safeguards (such as strong passwords and multi-factor authentication) for our internal systems.
- **Network Security:** Our IT infrastructure is secured with firewalls, intrusion detection systems, and regular vulnerability scanning. We keep our software and systems updated to protect against known security threats, and we use anti-malware and monitoring tools to detect and respond to suspicious activity.
- **Monitoring and Testing:** We log access and changes to key data systems to maintain an audit trail. Additionally, we periodically test and evaluate our security

measures (through security assessments, penetration testing, etc.) to ensure they remain effective in light of new threats.

- **Incident Response:** Havn has an incident response plan in place for addressing potential data breaches or security incidents. In the unlikely event of a security breach affecting personal information, we will promptly take steps to contain the incident, investigate, and **notify affected parties and regulators as required by law**. Such notification may occur via email, posted notice on our website or app, and/or other direct communication, consistent with legal requirements.

While we endeavor to follow best practices and maintain a robust security program, it's important to note that **no method of transmission over the internet or method of electronic storage is 100% secure**. Therefore, we cannot **guarantee** absolute security of information. You should also take care with how you handle and disclose your personal data and login credentials, and notify us immediately if you believe your interaction with us or your account security has been compromised.

**Disclaimer of Liability:** To the fullest extent permitted by law, Havn Spaces, LLC and its affiliates, owners, and operators will not be liable for any unauthorized access to or loss of personal information that is beyond our reasonable control. That said, we will always do our best to protect your data and will take responsibility as required by applicable law in the event of any data security incident. By using our services, you acknowledge and accept the inherent risks of data transmission and agree that Havn is not responsible for any malicious actions of third parties, provided we have adhered to the applicable legal requirements and standard security practices.

If you have any questions about our data security practices, or if you suspect any security-related issue, please contact us immediately (see **Contact Us** below). We appreciate your cooperation in keeping our community safe and secure.

## Your Privacy Rights (U.S. Residents)

As a user of our services in the United States, you may have certain **privacy rights** under applicable laws, particularly if you are a resident of states with specific data protection statutes. Havn Spaces is committed to honoring applicable privacy rights and providing transparency and control over your personal information. Below is a summary of rights that individuals may have under various U.S. state laws (such as the California Consumer

Privacy Act (CCPA) as amended by CPRA, and similar laws in Colorado, Connecticut, Utah, Virginia, etc.), and how you can exercise them:

- **Right to Know/Access:** You may have the right to request that we disclose what personal information we have collected about you. This can include the categories of personal info, specific pieces of info, the sources of that info, the purposes for collecting it, and the third parties with whom we have shared it. Upon verified request, we can provide you with a copy of the personal data we maintain about you in a portable format.
- **Right to Correction:** If you believe that any personal information we hold about you is inaccurate or incomplete, you have the right to request that we correct or update that information. We will take reasonable steps to verify the accuracy of the new information you provide and to make the correction, subject to some legal exceptions.
- **Right to Deletion:** You can request that we delete personal information that we have collected from you. Upon a verified request, we will delete your personal data from our records and direct our service providers to do the same, unless retaining the information is necessary for us or our service providers to complete a transaction you have requested, fulfill our contract with you, comply with a legal obligation, detect or prevent security incidents, or other permissible purposes under law. For example, we might not be able to delete data that is required to maintain an active membership unless you choose to cancel that membership.
- **Right to Opt Out of “Sale” or “Sharing” of Personal Data:** Some state laws define “sale” of personal data broadly to include certain types of disclosures, or “sharing” to include providing data for targeted advertising, even if no money is exchanged. Havn **does not sell your personal information** for money; however, we do use third-party analytics and advertising cookies that might be considered a “sale” or “sharing” under California law (specifically, the sharing of device identifiers for cross-context behavioral advertising). If you are a resident of a state that grants this opt-out right, you may instruct us to stop such data sharing for targeted advertising purposes. Practically, you can achieve this by using the cookie management tools described in the Cookies section (e.g. by opting out of advertising cookies via our site or through device settings). You may also contact

us to record an opt-out of sale/sharing, and we will honor it to the extent applicable.

- **Right to Opt Out of Targeted Advertising or Profiling:** In states like Colorado, Connecticut, Virginia, and Utah, you have the right to opt out of the processing of your personal data for targeted advertising. As described above, you can opt out through cookie controls or by contacting us. Havn does not engage in profiling decisions that produce legal or similarly significant effects without consent, but if you wish to opt out of any form of profiling-based decision-making, you may let us know.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of these privacy rights. This means, for example, we won't deny you services, charge you a different price, or provide a different level of quality just because you made a data rights request. In certain jurisdictions, we are permitted to offer financial incentives that relate to your personal data (such as a discount for signing up for marketing emails), but if we ever do so, we will present the terms to you and obtain any required consent, and you can opt-in or opt-out of such programs freely.

**Exercising Your Rights:** If you wish to exercise any applicable privacy rights, you (or an authorized agent acting on your behalf) can submit a request to us by contacting **privacy@joinhavn.com** with the subject line "Privacy Rights Request" and detailing your request. You may also call our support line at the phone number listed on our website and indicate that you have a privacy request. Please clearly state your name, contact information, and which right you seek to exercise (e.g. data access, deletion, correction, opt-out of sale, etc.). We will need to verify your identity **to a reasonable degree of certainty** before fulfilling a rights request, to ensure we are protecting your data from unauthorized access. Verification may involve matching personal information you provide with data we have on file, or asking for additional information (and for certain requests of a sensitive nature, we might request a signed declaration confirming your identity). Authorized agents must provide proof of authorization (such as a signed permission from you).

Once we receive and verify a valid request, we will respond within the timeframe required by law (for example, up to 45 days under CCPA, with the possibility of a 45-day

extension when reasonably necessary). If we need more time, we will inform you of the reason and extension period in writing. Any information we provide in response will cover the 12-month period preceding your request, or as required by law. For deletion requests, note that we will also direct our service providers to delete your data, where required, and we will confirm with you once the request has been completed. If we cannot comply with a request, we will explain the reasons (for example, certain data may be exempt from deletion due to legal retention requirements).

**California Shine the Light:** Separate from CCPA, California’s “Shine the Light” law allows residents to request certain information about any third parties with whom we have shared personal information for their direct marketing purposes. Havn does not disclose personal data to third parties for their own direct marketing without consent. If you have questions about this, you can contact us for more information.

We will not charge you a fee for exercising your rights unless the law permits us to do so (if a request is manifestly unfounded or excessive, in which case we may charge a reasonable fee or decline to comply). In all cases, we will explain our response clearly.

**Your Choices (Marketing and Preferences):** Apart from formal rights requests, you also have control over certain uses of your data through your account settings or communication preferences. For example, you can unsubscribe from our marketing emails at any time by clicking the “unsubscribe” link in the footer of the email, or by contacting us to request removal. You can also opt out of certain notifications (like push notifications from our mobile app) by adjusting the settings on your device or in the app. Please note that even if you opt out of marketing messages, we may still send you important administrative or transactional communications (such as billing notices, security alerts, or updates to our terms) as those are necessary for our relationship with you.

If you have any questions about your privacy rights or how to exercise them, you can always reach out to us at [privacy@joinhavn.com](mailto:privacy@joinhavn.com). We are here to help and committed to ensuring you can exercise your rights.

## Do Not Track Signals

“Do Not Track” (DNT) is a preference you can set in your web browser to signal that you do not wish certain information about your website visits to be collected across websites. At this time, there is no uniform standard adopted by industry groups, technology companies, or regulators to govern how DNT signals should be interpreted. Consequently, **our websites do not currently respond to “Do Not Track” signals** or similar mechanisms from browsers. We will continue to monitor the development of DNT technology and standards. In the meantime, if you wish to limit tracking, we recommend using the opt-out methods described in the Cookies section above (such as managing cookies or using private browsing mode). Keep in mind that limiting cookies or trackers might affect the functionality of our services (for example, some personalization features rely on cookies).

## Third-Party Links and Services

Our website and apps may contain links to external websites, plug-ins, or services that are not operated by Havn Spaces. For example, we might link to a partner’s website for event sign-up, to social media pages, or to third-party resources we think may be useful. If you click on a third-party link, you will be directed to that third party’s site, which is outside of our control. **Please note that this Privacy Policy does not apply to the privacy practices of third-party websites or services**, even if you access them through our site. We are not responsible for the content, security, or privacy policies of any sites or services that we do not own or operate. We encourage you to review the privacy policy of every website or application you visit or use.

For example, if you choose to interact with Havn on social media (such as Instagram or LinkedIn) or click a social media icon on our site, those interactions are governed by the privacy policy of the respective platform. Similarly, if we offer integration with third-party services (like Google Calendar for booking conference rooms), any data those services collect via the integration would be handled according to their own policies.

Havn Spaces’s inclusion of a third-party link or service is not an endorsement of that third party or its data practices. It is provided for your convenience. We recommend that you exercise caution and read the privacy statements of any third-party sites or services

you visit to understand how they collect and use your information. If you have any concerns about data that you share with third parties, we encourage you to contact those providers directly.

## Children's Privacy

Our services are **not directed to children under 13 years of age**, and we do not knowingly collect personal information from anyone under 13. If you are under 13, please do not use our websites or services or send us any personal data. Parents or guardians should supervise children's internet usage and ensure children do not share personal data without permission.

In the event that we learn we have inadvertently collected personal information from a child under 13, we will take prompt steps to delete such information from our records. If you believe that we might have any information from or about a child under 13, please contact us immediately so that we can investigate and address the issue.

For teens between 13 and 18, our policy is that they should only use Havn services with the involvement and consent of a parent or guardian (such as if a parent brings a teenager as a guest to a Havn space for a specific event). However, our memberships and general offerings are intended for adult professionals. We do not offer services to minors without parental consent and appropriate agreements in place.

If future Havn programs involve minors (for example, a special event allowing young entrepreneurs or students), we will implement appropriate policies and obtain any necessary parental consents in compliance with applicable laws (such as the Children's Online Privacy Protection Act, "COPPA").

## Accessibility of This Policy

We are committed to ensuring this Privacy Policy is accessible to individuals with disabilities. This Policy is written in plain language and structured for clarity. If you use assistive technology (such as a screen reader) and find this document is not fully accessible, or if you need to access this Privacy Policy in an alternative format, please contact us and we will provide the information in a format that works for you. For example, we can provide a large-print version, an audio recording, or have a

representative verbally explain the contents to you, depending on your needs. Providing accessible customer service and information is important to Havn Spaces, and we will make good faith efforts to accommodate reasonable requests.

## Changes to This Privacy Policy

We may update or revise this Privacy Policy from time to time to reflect changes in our practices, technologies, legal requirements, or for other operational reasons. If we make material changes to the way we collect or use personal information, we will provide prominent notice (such as by posting a notice on our website or notifying members via email) and indicate at the top of the Policy when it was last updated. We encourage you to review this Privacy Policy periodically to stay informed about our data practices.

Your continued use of Havn Spaces services after any update to this Policy will constitute your acknowledgment of the changes and agreement to the new terms, to the extent permitted by law. If you do not agree with any changes, you should discontinue use of our services and may contact us if you have concerns. For significant changes, we may seek your explicit consent where required.

## Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or how Havn Spaces handles your personal information, please do not hesitate to reach out to us:

- **Email: [privacy@joinhavn.com](mailto:privacy@joinhavn.com)** – This is the dedicated email address for privacy inquiries and requests (such as data access or deletion requests).
- **Mail: Havn Spaces, LLC – Privacy Team, 470 West 200 North, Salt Lake City, UT 84103, USA.** (Please note this mailing address is provided for written privacy correspondence. For visiting our locations, please refer to our website for the specific site addresses in Salt Lake City or Lehi.)
- **Phone:** You may call our main line at **(801) 516-3940** and indicate you have a privacy question or request. Our customer team will route your inquiry to the appropriate privacy contact.

We will do our best to respond promptly to your questions and resolve any issues to your satisfaction. If you contact us to exercise a privacy right, please see the **Your Privacy Rights** section above for information on the verification process and expected timeline.

Thank you for entrusting Havn Spaces with your personal information. We value your privacy and are committed to providing a safe and enjoyable coworking experience.