Privacy Notice

22 October 2026

About this Notice

Sharesy Ltd ("**we**" or "**us**") take the privacy of your information very seriously. This Privacy Notice is designed to tell you about our practices regarding the collection, use and disclosure of personal information which may be collected in person from you, obtained via our websites or apps, or collected through other means such as by an online form, email, or telephone communication.

This notice is governed by the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and any successor legislation ("Data Protection Legislation").

This notice applies to the community spaces listing, booking and management services platform provided by us (the "**Service**") and relates to any personal information provided by our users, customers and contacts (including those who manage, run or own community spaces and those who hire the spaces, on behalf of themselves or organisations) whose data we process.

In this notice "**you**" refers to any individual whose personal data we hold or process. This notice is governed by the relevant data protection laws in the United Kingdom from time to time.

Personal data we collect and how we process this data

Below we have set out the categories of data we collect, the legal basis we rely on to process the data and how we process the data:

- Contact information for individuals responsible for community spaces who list with the Service, as well as any individuals who book through us and our users in general. This information may include names, email addresses, phone numbers, addresses ("**Contact Information**"). We process this information when we communicate with you or provide services to you on the basis of the performance of our contract with you and on the basis of our legitimate interest in providing our services to our clients.
- Information relating to any bookings made through the Service ("**Booking Information**") which may include dates and times of bookings, properties booked or listed, records of transactions. We process this information when we manage bookings on the basis of the performance of our contract with you and on the basis of our legitimate interest in providing the Service.
- information provided in relation to comments or reviews posted to the Service ("**Comment Information**"). We process this information on the basis of our legitimate interest in providing the Service.

- information you provide when you sign-up to a newsletter or ask or agree to receive information relating to our products and services such as your name, telephone number, email address, and service or product preferences ("Sign-Up Information"). We process this information on the basis of your consent, which you can withdraw at any time by using the unsubscribe link in our emails or by contacting us.
- information provided relating to payment ("Payment Information"), but please note that credit or debit card information may be supplied directly to a third-party payment processor who will process the data in accordance with their own privacy notices or policies (see below). We process this information when we manage bookings or collect or process payments on the basis of the performance of our contract with you and on the basis of our legitimate interest in providing the Service.
- A record of any correspondence or communication between you and us ("Communication Information"). We process this information when we monitor our relationship with you and provide services to you on the basis of the performance of our contract with you and on the basis of our legitimate interest in providing our services to our clients.
- Marketing information we may hold about you in order to provide information about our services; this may include names, email addresses, phone numbers, addresses, and other information ("Marketing Information"). We process this information in order to communicate with you about our products and services on the basis of our legitimate interests in communicating with you about our services or on the basis that you have consented to receive the information.

We will collect information either from you directly or from a third party. For instance, a property owner may provide us with information relating to emergency contacts. If we do obtain your personal data from a third party your privacy rights under this notice are not affected and you are still able to exercise the rights contained within this notice.

You don't have to give us your personal data, but we need your Contact Information, Booking Information and Payment Information to set up your account and process bookings. Without it, we won't be able to provide the Service to you.

Data Retention

Our current data retention policy is to delete or destroy (to the extent we are able to) personal data after the following periods:

- Records relating to a contract with us - 7 years from either the end of the contract or the date you last used our services or placed an order with us,

being the length of time following a breach of contract in which a contract party is entitled to make a legal claim.

- Marketing records - 3 years from the last date on which you have interacted with us.

For any category of personal data not specifically defined in this notice, and unless otherwise specified by applicable law, the required retention period for any personal data will be deemed to be 7 years from the date of receipt by us of that data. The retention periods stated in this notice can be prolonged or shortened as may be required (for example, in the event that legal proceedings apply to the data or if there is an on-going investigation into the data).

Cookies

We use cookies and similar technologies, such as your browser's local storage. Some are essential: for example, they keep you signed in, remember your cookie choices and save booking details you've entered. With your consent, we also use analytics cookies (Google Analytics, Amplitude and Inspectlet, which records how visitors use pages) to understand and improve our website, and marketing cookies (Google Ads and Meta) to measure our advertising. You can see the cookies we use and change your choices at any time using the "Manage cookies" link at the bottom of our website.

Sharing your information

We may disclose information to third parties in the following circumstances:

- When you make an enquiry or a booking, we share your Contact Information and Booking Information with the space provider so the booking can go ahead, and we share the space provider's contact details with you.
- As part of our services we may provide information to our third-party service providers.
- We may disclose information to our group companies.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime).
- In order to enforce any terms and conditions or agreements for our services that may apply.
- We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, but we will take steps with the aim of ensuring that your privacy rights continue to be protected.

- To protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

If we do supply your personal information to a third-party, we will take steps to ensure that your privacy rights are protected and that third-party complies with the terms of this notice.

Security

We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage.

Your privacy rights

With respect to your personal data, you have the right to:

- object to us processing your personal data where we rely on our legitimate interests;
- ask for a copy of any personal data that we have about you;
- request a correction of any errors in or update of the personal data that we have about you;
- request that your personal data will not be used to contact you for direct marketing purposes;
- request that your personal data will not be used for profiling purposes;
- ask us to restrict how we use your personal data;
- request that your personal data be transferred or exported to another organisation, or deleted from our records; or
- at any time, withdraw any permission you have given us to process your personal data

All requests or notifications in respect of your above rights may be sent to us in writing at the contact details listed below. We will endeavour to comply with such requests as soon as possible but in any event, we will comply within one month of receipt (unless a longer period of time to respond is reasonable by virtue of the complexity or number of your requests).

If personal data we hold about you is subject to a breach or unauthorised disclosure or access, we will report this to the Information Commission and/or our data protection manager.

If a breach is likely to result in a risk to your data rights and freedoms, we will notify you as soon as possible.

Transferring your information outside Europe

Some of our service providers are based in, or process personal data in, countries outside the UK and the European Economic Area ("European Area"), mainly the United States. These include the providers we use for payments, emails and text messages, account sign-in, website analytics and advertising, error monitoring and AI features. Personal information may also be transferred outside the European Area in other circumstances, in particular:

- if you are based outside of the European Area or use our services while you are outside the European Area, your information may be transferred outside the European Area in order to provide you with our services;
- we may communicate with individuals or organisations outside of the services in providing our services, those communications may include personal information (such as contact information) for example you may be outside of the European Area when we communicate with you; and
- from time to time your information may be stored in devices which are used by our staff outside of the European Area (but staff will be subject to our cyber-security policies).

If we transfer your information outside of the European Area, and the third country or international organisation in question has not been deemed by the UK Secretary of State to have adequate data protection laws, we will provide appropriate safeguards, such as the International Data Transfer Agreement or the UK Addendum to the EU standard contractual clauses, and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice. You can ask us for a copy of these safeguards using the contact details below.

Contact us

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal information or how it is handled, you can do so by us using the details below:

Address: FAO Data Protection Manager, Sharesy Ltd, Sharesy Ltd C/o BBK Partnership, 1 Beauchamp Court, 10 Victors Way, Barnet, Hertfordshire, EN5 5TZ

Email: privacy@sharesy.com

Complaints

If you have a complaint about how we have used your personal information, please contact us using the details above. We will acknowledge your complaint within 30 days and respond in line with our complaints procedure.

If we are unable to resolve any issues you may have or you would like to make a further complaint, you can contact the Information Commission by visiting http://www.ico.org.uk/ for further assistance.