

## **Privacy Policy for Hoxton Square Wi-Fi**

This privacy policy relates to the collection and processing of data by Lucidica in connection with its operation of and your use of the wireless internet access services provided by Lucidica from time-to-time (the "**Service**").

Third party Internet sites that you access using the Services are not covered by our privacy policy (or our terms of use), and so you should take care when submitting any personal information to any such websites.

We may change our privacy policy from time-to-time. New policies will be published on our websites.

### **1. Defined Terms**

"Customer", "you" and "your" means you, the person registering or logging on to use the Service;

"Lucidica", "we" and "our" means Lucidica Limited of 35 Kingsland Road, E2 8AA, the company providing the Service;

"Project Sponsors" are the businesses/organisations that have supported and launched the Service (or which sponsor the Service from time-to-time following launch) and which are at the time of the launch of the Service, Shoreditch Trust, Lucidica, Accelerator and Tiger Beer.

### **2. What personal information do we collect about you?**

2.1. When you register or subsequently logon to access the Service we will ask you for the following information:

- 2.1.1. Your name
- 2.1.2. Your email address (used as a username)
- 2.1.3. Password
- 2.1.4. Your postcode
- 2.1.5. Your IP address
- 2.1.6. Duration of your session

2.2. We may also collect personal information about you as a result of any correspondence that you may enter into with us from time-to-time.

2.3. We do not actively monitor your use of the Service or the websites you visit while using the Service, but we may elect to access this information and may pass it on to any law enforcement authority or otherwise as legally required or permitted in order to monitor and enforce compliance with the Terms of Use of the Service or if we become aware of or suspect that your use of the Service is in any way in breach of applicable law.

2.4. From time-to-time we may offer additional services, promotions or competitions via the Service. If you choose to receive any additional services or enter into any promotions or competitions through the Service we may ask you for additional information and you will notified of the purposes for which such information will be used at that time.

- 2.5. In the event that we elect to charge for the use of the Service at any time in the future, we may collect additional information in order to ensure that you are correctly charged for the use of the Service. We will notify you of what additional information is to be collected and how it will be used before we collect any such additional information.
- 2.6. Lucidica will be the data controller in respect of any personal data that you submit in relation to the Services. You can contact Lucidica using the details below.

### **3. What do we use this information for?**

- 3.1. We will use the data that we collect about you to:
- 3.1.1. administer your user account and any customer complaints or queries that may arise from time-to-time;
  - 3.1.2. monitor and enforce your compliance with the terms of use of the Service;
  - 3.1.3. monitor and improve the performance of our network;
  - 3.1.4. unless you have opted out, to provide you with information about our other products and services from time-to-time;
  - 3.1.5. otherwise as set out in this privacy policy.
- 3.2. We do not use this information to:
- 3.2.1. identify individuals visiting our website; or
  - 3.2.2. analyse your visits to any other websites or track any Internet searches which you may make while on our website.

### **4. Who do we share your information with?**

- 4.1. In order to provide the Service to you and enable you to browse the internet, we will need to disclose some personal data to other network operators and website publishers. We will only disclose information to them to the extent necessary to enable you to use the Service.
- 4.2. If you have opted in at any time, your information will be shared with the Project Sponsors so that they can provide you with information about their respective products and services that may be of interest to you. Following such disclosure, each of the Project Sponsors will be a data controller in respect of your information. If you have agreed to receive information about products and services from our Project Sponsors and later decide not to you will need to contact the sponsors directly to let them know.
- 4.3. We may provide information, in response to properly made requests, for the purposes of the prevention and detection of crime, and the apprehension or prosecution of offenders. We may also provide information for the purpose of safeguarding national security. In either case we do so in accordance with the Data Protection Act. We also provide information when required to do so by law, for example under a court order, or in response to properly made demands, under powers contained in legislation.
- 4.4. If there is a change (or prospective change) in the operation of Hoxton Wifi or any of its assets, we may disclose personal information to the new (or prospective) operator. If we do so, we will require them to keep it confidential.

4.5. Save as set out above or otherwise as may be permitted or required by applicable law, we will not share your information with anybody else without your permission.

4.6. If you believe the personal information we hold on you is incorrect you may contact us using the details provided below.

## **5. How long do we keep your personal information?**

The time period for which we keep information varies according to what the information is used for. In some cases, there are legal requirements to keep data for a minimum period. Unless there is a specific legal requirement for us to keep the information, we will retain it for no longer than is necessary for the purposes for which the data was collected or for which it is to be further processed.

## **6. Can I opt out of receiving marketing information from Lucidica?**

At the time that we collect your information from you, you will be given the opportunity to opt out of receiving marketing information from us. You may choose not to receive marketing information from us then or, if you are already receiving this information from us, you can ask us to stop at any time by sending us an email to [unsubscribe@lucidica.com](mailto:unsubscribe@lucidica.com). If you are receiving information from any of the Project Sponsors you will need to contact them directly to ask them to stop.

## **7. Security of your personal information**

We are serious about guarding the security of your personal information and the details of any transactions made. We take appropriate organisational and technical security measures to protect your data against unauthorised disclosure or processing. We use a secure server to store the information you give us when you register. Any personal data you send us online is securely encrypted.

## **8. Cookies**

8.1. If you create an account with us the Service will install a cookie on your PC. The cookies is a small amount of information that We install on Your PC to store your username and password so that can You log onto the Service quicker each time and get the most out of the Service in the future. If You do not wish Us to install cookies on Your computer for these purposes, You may change the settings on Your internet browser to reject cookies. For more information please consult the "Help" section of Your browser. Please note that if You do set Your browser to reject cookies, You may not be able to use all of the features of Our Service.

8.2. If you are having trouble configuring your browser please feel free to contact us using the details below and we will do our best to help you.

## **9. Contacting Lucidica**

9.1. If you wish to contact Lucidica in relation to the collection and use of your personal information, to find out what information we may hold about you or to correct any errors that there may be in the personal information that we hold about you, please do so at the following address: [info@hoxtonwifi.com](mailto:info@hoxtonwifi.com). We will aim to respond to all queries within 7 days.

9.2. If you make a request to receive a copy of the personal information that we hold about you we reserve the right to ask you to provide reasonable proof of your identity and we charge an administration fee of up to £10.