



PEOPLESPLACE PRIVACY NOTICE POLICY

EFFECTIVE DATE: March 16, 2020

1. ABOUT PEOPLESPLACE

Interior Office Solutions, Inc. (DBA PeopleSpace) is a privately held corporation headquartered in Irvine, CA which designs and installs adaptable workspaces and exterior spaces for businesses. The company serves markets on the West Coast through our five Customer Experience Centers.

2. OVERVIEW

At PeopleSpace, your privacy is important to us. We process personal data in different contexts by fully respecting your privacy and your rights and freedoms as part of our commitment to ethical and responsible practices.

We also understand that privacy is very important to you. This Privacy Policy Notice ("Policy") explains how PeopleSpace may use and disclose information we collect from and about you when you our website or otherwise interact with us, as well as your ability to control uses of it. This is the complete agreement between you and PeopleSpace with respect to your use of our website.

3. TYPES OF PERSONAL DATA WE COLLECT AND USE

PeopleSpace classifies personal data as any information related to an identified or identifiable individual. Depending on your interactions with PeopleSpace, we collect and use different types of personal data from visitors, customers, prospective customers and agents.

We value the privacy of our website visitors. We do not sell your personal data. We will only collect and use your information as explained in this Policy. This section gives a brief overview of our data collection and use.

The categories of information that we may collect directly from you include the following:

- Clients: We collect name, contact information for key personnel, and personal data that you provide us on a voluntary basis such as credit card and financial information.
- Prospective clients: We collect name and contact information.
- Visitors to our locations: We collect name, contact information and video images from security cameras in our Customer Experience Center buildings.

The following are examples of the other categories of information which we may collect when you visit and use our website:

- Technical information collected from your computer or mobile device (e.g. your IP address, browser type, operating system);
- Information about your usage of our websites (e.g. the pages you visit when using the Services, the search terms you enter on the Services, how often you use the Services, and the pages you access before and after accessing the Services).

4. USES AND PURPOSES OF PERSONAL DATA

The purposes for which we collect and use your personal data may vary depending on the type of relationship you have with us, such as if you are one of our customers or a website user. We will seek your consent before using your personal data for any purposes not listed below.

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The information we collect is used to:

- Administer your account. If you have a commercial relationship with PeopleSpace, we use your personal data to develop our contractual relationship and to comply with legal, regulatory, insurance, security and processing requirements.
- Maintain our business records for commercial relationships using customer information to ensure the proper operation of the day-to-day business, such as by customizing your site experience, allowing customer service to better respond to your requests, quickly processing any transactions and administering sales activities.
- Respond to prospective customer requests for information, products or services, and for marketing activities such as administering a promotion, survey, or other site feature.
- Send marketing messages if you opt-in to receive marketing communications from us. You may change your preferences or opt out of all e-mails at any time by clicking on the "unsubscribe" link found at the bottom of each e-mail.
- Improve our services, including by conducting analytics, collecting statistics, to generating profiles to the extent that it is in our legitimate interest to do so.
- Operate our website, including by managing your account registration, storing your preferences and settings, providing interest-based advertising to website visitors, generating aggregated statistics and analyzing how you use our website and online services.
- Comply with our legal obligations, including by complying with tax reporting obligations and responding to legitimate law enforcement requests.

To improve the products and services offered, we may use business partners to help us design and operate our website or provide other services to support the site. For example, we may hire a company to run certain website applications, help us fulfill orders, process credit card payments, or help us analyze our data. Unless otherwise indicated on our website, if we allow our business partners to access the personal data we collect, it will be for limited purposes and consistent with this privacy policy.

We may release your information without prior notice when we believe it is appropriate to prevent fraud; to comply with law or to cooperate with law enforcement activity or other governmental request; to respond to subpoenas, court orders or administrative agency requests for information; to enforce our policies; to protect the rights, property and safety of our business and of others; or when required or otherwise permitted by law. If there is a sale or merger of all or substantially all the company, division or business unit that operates this site, we may also transfer the information we have collected in connection with such sale or merger.

5. LEGAL BASES FOR DATA PROCESSING

PeopleSpace only processes personal data when there is a fair and legal basis for its collection and use, for instance, when the collection of personal data is necessary to enter into a contract, to meet our legitimate interests, to comply with legal obligations or when we have your consent.

The information we collect when we enter into a contract or business relationship with you is necessary to comply with our contractual obligations to you. Without your personal data, we would not be able to provide our goods and services to you. In some cases, we are required to collect personal information to comply with our legal obligations under U.S. or other applicable law, as described elsewhere in this notice. For example, some tax laws, labor, and anti-fraud laws require organizations to collect certain information that may vary depending on local regulations.

We conduct marketing activities based on your consent unless you have an existing business relationship with us. In any case you can opt-out of these communications any time and free of charge.

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7. RETENTION PERIODS

PeopleSpace retains personal data for only the length of time required to fulfill the purpose for which the data was collected. We do not keep personal data for longer than is necessary, and what is necessary depends on specific circumstances such as regulations requiring us to retain information for a certain period of time and limitation periods of legal claims.

8. DISCLOSURES TO THIRD PARTIES AND PROCESSING ACTIVITIES

At times, PeopleSpace engages third party agents, service providers, or other vendors to help accomplish our business objectives. There are other circumstances where we are required by law to disclose personal data to third parties such as public bodies or judicial authorities.

We engage with third party contractors, service providers and other vendors for some of the following services: NetSuite for our Customer Relationship Management (CRM), Adobe for digital customization, MailChimp for marketing email distributions and Lynx for Haworth manufacturer orders. If the engagement involves the transmission of personal data, PeopleSpace requires the service provider to treat that data consistent with this Policy. A contract to protect the personal data should be executed before any data is disclosed.

9. SECURITY

PeopleSpace is committed to the security, confidentiality and integrity principle. We take commercially reasonable precautions to keep your information secure against unauthorized access and use and we periodically review our security measures. We are committed to processing your data in a secure manner and have put in place specific technical and organizational measures to prevent the personal data we hold from being compromised.

11. YOUR CALIFORNIA PRIVACY RIGHTS

For California residents: PeopleSpace may share your personal data with affiliated third parties, some of which do not share the PeopleSpace name, for their direct marketing purposes. As this category of affiliate is considered an unaffiliated party under California law, you may request information about our disclosure of personal data to third parties for their direct marketing purposes.

13. CHANGES TO THIS POLICY

We reserve the right to modify this Policy and related business practices at any time. We will duly inform you of any changes.

14. CONTACT INFORMATION

At PeopleSpace we are committed to apply this Policy and the accountability principle. For this reason, if you have any concern or questions about how your personal data is used, please feel free to contact us by emailing Michelle Sample, Chief Marketing Officer at msample@peoplespace.com or calling us at (949) 724-9444.

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