

Privacy Policy

This Privacy Policy is edited by Magna Housing Limited, registered office Everdene House, Railway Triangle Industrial Estate, Poundbury Road, Dorchester DT1 2PJ. Magna is a charitable registered society No. 7520. We are regulated by the Regulator of Social Housing.

The Data Controller offers a platform to collaborate and network with cross sector professionals to share innovation to find solutions to common challenges and invites stakeholders (users) which subscribed on the Platform and as such have a user account (hereafter, the “**Users**”). The Platform is available at the following url address www.rethinkplaces.co.uk

The Data Controller uses a solution called “Hivebrite”, which enables the import and export of user lists and data, the management of content and events, the organisation of emailing campaigns and opportunity research and sharing as well as the management of funds and contributions of any kind.

In this regard, the Data Controller collects and processes User’s personal data in accordance with the Privacy and Cookie policy.

The Data Controller is particularly aware and sensitive with regards to the respect of its Users privacy and personal data protection. The Data Controller commits to ensure the compliance of the processing it carries out as data controller in accordance with the Data Protection Law.

The Data Controller has put in place an appropriate privacy and cookie policy to be fully transparent on how the personal data of Users are processed within the use of the Platform and services provided.

This privacy policy is intended for the Users of the Platform of the Data Controller.

Data Controller has appointed a Data Protection Officer (hereinafter “DPO”) you may contact dpo@magna.org.uk

Date of last update: 21/05/2025.

ARTICLE 1. COLLECTED PERSONAL DATA**1.1 When subscribing on the Platform**

When subscribing to the Platform, the User is informed that its following personal data is collected for the purpose of creating a user account:

Mandatory data

- First name
- Last name
- Email address
- Industry

Optional Data

- What are you most passionate about?
- What's the challenge to solve?
- pronoun
- Job title
- Company name
- Start date
- End date
- Interests
- Birthday
- Summary
- Skills
- Nationality
- Work mobile
- LinkedIn profile URL
- Instagram Profile URL
- Facebook profile URL

The User is informed that it is not possible to access the Platform without providing the mandatory data strictly necessary to create an account and authenticate the User.

1.2 During the use of the Platform

The User may validly publish, at its own initiative, any content on the Platform which shall be kept by the Company:

- Posts
- Events
- Groups
- Forums
- Media
- Live Chat

The User is aware that when using the Platform, the User may decide to provide « sensitive data » within the meaning of Data Protection Law, for example, data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, concerning sexual orientation, etc. By providing such sensitive data, the User agrees to their processing by the Platform in the conditions set forth in this Privacy Policy.

ARTICLE 2. THE PURPOSE OF THE DATA PROCESSING

The Data Controller and its subcontractors process personal data that are freely transferred by the User when accessing the services proposed by the Platform for the following purpose:

Purpose	Legal basis
<i>Creation and management of a user account;</i>	UK GDPR Data Protection Act 2018
<i>Providing the User with all functionalities of the Platform, meaning:</i> <ul style="list-style-type: none"> ● <i>Sending invitations for events organised by Community Manager or other Users, if the User has accepted to receive such invitations;</i> ● <i>Invite the User to events organised by users or the Community Manager.</i> ● <i>News Alerts</i> 	

<i>Management of data subjects rights according to the Personal Data Legislation.</i> <i>Storage of User personal data;</i>	
<i>Management of prospection operations:</i> <ul style="list-style-type: none"> • <i>Sending email prospect campaigns to users registered on the platform and external stakeholders</i> • <i>Sending newsletters to users registered on the platform</i> 	
<i>Making statistics in order:</i> <ul style="list-style-type: none"> • <i>to improve the quality of the services proposed by the Platform;</i> • <i>improve the usage functionalities of the Platform;</i> • <i>Ensure the purpose and goals of the platform are relevant and engaging to its intended users/stakeholders.</i> 	
<i>Enable the synchronisation of the User's LinkedIn profile</i>	

Please note that Kit United, and its subsidiaries – in charge of providing the platform and managing its technical aspects - also collect your personal data as data controller, in order to generate statistics on the use of the platform. This processing is based on the data controller's legitimate interests to improve the platform. The personal data are retained for the duration of the contractual relationship between Kit United and the Data Controller, plus 90 days.

ARTICLE 3. DATA RETENTION PERIOD

The Data Controller informs the User that the personal data related to the User Account is retained only during the length of the User's subscription on the Platform.

Inactive User Accounts may be deleted after two years of inactivity.

Following the termination of said subscription, the data collected upon the subscription as well as the content published by the User on the Platform shall be deleted after a period of 6 months.

ARTICLE 4. DATA TRANSFERS

The Users' data are stored in the European Economic Area (EEA) by the Data Controller, and its trusted service providers. However, depending on the processing, the Users' data may also be transferred in a country outside the EEA, to our trusted service providers and its subsidiaries.

When transferring data outside the EEA, the Data Controller ensures that the data are transferred in a secured manner and with respect to the Data Protection Law. When the country where the data are transferred does not have a protection comparable to that of the EU, the Data Controller uses "appropriate or suitable safeguards".

When the service providers to whom personal data are transferred, are located in the United States, these transfers are governed by the standard data protection clauses adopted by the Commission.

Users can contact the DPO at the following address dpo@magna.org.uk.

Personal data transfers may take place outside the EU/EEA in order to ensure the functioning of the solution. Indeed, Hivebrite uses third party services providers located outside the EU for the following purposes:

- hosting of personal data, including image, profile pictures, backups, etc.;
- production and storage of error logs enabling Hivebrite's developers to correct the code;
- sending of emails;
- customer supports;
- direct messaging module;
- analysis of the User's journey of the platform.

The country outside the EU/EEA where your personal data may be transferred are:

- United Kingdom;
- Switzerland;
- The United States of America;
- Australia.

These transfers are based on one of the following guarantees:

- an adequacy decision, regarding personal data transfers to the

United Kingdom and Switzerland;

- the Standard Contractual Clauses of the EU Commission ([available here](#));
- your consent.

ARTICLE 5. COMMITMENT OF THE DATA CONTROLLER

The Data Controller commits to process User's personal data in compliance the Data Protection Law and undertake to, notably, respect the following principles:

- Process User's personal data lawfully, fairly, and in a transparent manner;
- Only collect and process the Users' data for the strict purpose as described under article 2 of the present privacy policy;
- Ensure that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Do the best efforts to ensure that the personal data processed are accurate and, if necessary, kept up to date and take all reasonable steps to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Keep personal User's data for no longer than is necessary for the purposes for which they are processed;
- Put in place all necessary technical and organizational appropriate measures in order to ensure the security, confidentiality, integrity, availability and the resilience of the process systems and services;
- Limit the access to the Users' data to the persons duly authorized to this effect;
- Guarantee to the Users their rights under the Data Protection Law in relation to the processing of their data and make the best efforts to satisfy any request, where this is possible.

ARTICLE 6. EXERCISE OF THE USERS' RIGHTS

The User is duly informed that it disposes at any time, depending on the legal basis of the processing, a right to access, to rectification, to erasure, to restriction of processing, to data portability, and to object.

When processing is based on User's consent, the right to withdraw

consent at any time, without affecting the lawfulness of the processing based on consent before its withdrawal.

The User can exercise its rights by sending an email to the following address RethinkPlaces@Magna.org.uk provided that the User justifies his/her identity.

In addition, in the event the User considers that its rights have not been respected, the User of which the personal data is collected can lodge a complaint before the competent supervisory authority. For any additional information, you can review your rights on the websites of the competent authorities.

The competent supervisory authorities are listed on the following website:

http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

ARTICLE 7. COOKIES

The Data Controller informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform subject to the conditions described in the Data Controller Cookie Policy.

In particular, Hivebrite may use a cookie called "Amplitude", to enable analytics of the User's journey on the platform. This cookie involves a transfer of personal data to the United States of America. Hivebrite has signed Standard contractual clauses in order to comply with the requirements of the GDPR on personal data transfer, and will not use this cookie without gathering your consent first.

For more information about the processing carried out by Hivebrite as data controller, the User is invited to consult [Hivebrite's privacy policy](#).

ARTICLE 8. RECIPIENT AND PERSONS AUTHORIZED TO ACCESS THE USERS' DATA

Only **authorized persons working for the Data Controller** (including the Community Manager can access your personal data. The Data Controller makes its best effort to ensure that these groups of people remain as small as possible and maintain the confidentiality and security of User's personal data.

The Data Controller also uses **trusted service providers** to carry out a set of operations on his behalf for hosting. The Data Controller can also use service providers in the tech industry, editors of specific tools integrated in the Platform for technical purposes.

The Data Controller only provides service providers with the information they need to perform the service and ask them not to use your personal data for any other purpose. The Data Controller does his best to ensure that all these trusted service providers only process the personal data on our documented instructions and provide sufficient guarantees, in particular in terms of confidentiality, expert knowledge, reliability and resources, to implement technical and organizational measures which will meet the requirements of the applicable legislation, including for the security of processing.

The Data Controller may be required to disclose or share your personal data to comply with a legal obligation, or to enforce or apply our terms of use/sale or any other conditions you have accepted; or to protect the rights, safety or property of Magna Housing, its customers or employees.

List of the main service providers:

Service Provider	Service	You can consult the privacy policy by clicking on the following link:
KIT UNITED 5 RUE DES ITALIENS 75009 Paris France	HIVEBRITE solution	https://hivebrite.io/privacy-policy