



COOKIES & PRIVACY POLICY

This MVP web platform site is operated by Spaceling Ltd (the **Company**) and we take your privacy very seriously. We are committed to respecting the privacy of all visitors to our web platform <https://mvp-landing.dev.myspaceling.space> (the **Platform**). This Cookies & Privacy Policy (the **Policy**) sets out the information we collect when you visit the Platform or use our services.

We endeavour to ensure that any of your personal information provided to us or otherwise obtained by us and from which you can be identified (the **Personal Information**) is handled in accordance with the UK Data Protection Act 2018, the UK General Data Protection Regulation, the Privacy and Electronic Communications (EC Directive) Regulations 2003, and all similar or related legislation (the **Data Protection Legislation**). You can be assured that your Personal Information will only be used in accordance with this Policy, the membership package you have selected and the preferences you have communicated to us.

By visiting and/or contacting us through the Platform (or engaging with us in any other way), you acknowledge that we may collect, use and transfer your Personal Information as set out in this Policy.

The Company reserves the right to change this Policy from time to time as and when felt necessary and you should therefore check this page frequently to ensure that you are happy with any changes made.

In this Policy, "**Spaceling**", "**the Company**", "**we**", "**us**" and "**our**" refer to Spaceling Ltd, registered in England and Wales with registered office at International House 64 Nile Street, London N1 7SR United Kingdom and our company registration number is 12184291. We are registered as a data controller with the Information Commissioner's Office, with registration number ZA824322.

Personal Information that we collect from you

When you engage with us (e.g. by visiting the Platform, making an enquiry, logging in to the Platform, filling in a form on the Platform, making a payment, etc) you may provide, and/or we may collect, certain Personal Information. For example, this may include (but is not limited to):

- information that you provide by logging in or completing forms on the Platform, such as, but **not** limited to, your name, email address, contact details, the country you are based in, the details of your case, information to verify your identity, and any other information or material you upload or submit on the Platform;
- details of any requests or transactions you make through the Platform;

- information about your activity on and interaction with the Platform, such as your IP address and the device or browser you use; or
- communications you send to us (for example, when you ask for support, send us questions or comments, or report a problem).

Some of this Personal Information is collected and processed so that we can provide you with our services (see “What we do with your Personal Information” below).

We also collect, use and share aggregated data such as statistical or demographic data which is not Personal Information as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' data relating to how they use the Platform to calculate the percentage of users accessing a specific Platform feature in order to analyse general trends in how users are interacting with our Platform and to help improve the Platform and our service offering.

Personal Information that we receive from other sources

We may receive information from third parties who collect Personal Information from you and pass it on to us. Where this is the case, the third party is responsible for obtaining the relevant consents from you or otherwise having the appropriate legal bases in place to ensure the ways in which your Personal Information will be used complies with Data Protection Legislation.

Where you upload the Personal Information of a third party to the Platform, you are responsible for obtaining explicit consent from that third party to the ways in which their Personal Information will be used.

What do we do with your Personal Information

We will only collect and process your Personal Information: (a) in order to supply the services that you have requested and correspond with you; (b) to provide support to you in respect of these services; (c) to analyse and improve the use of our Platform and services, and support and improve the browsing experience of visitors to the Platform; and (d) for our internal business processes (e.g. administering and protecting our business and the Platform by carrying out troubleshooting, data analysis, testing, system maintenance, support and hoisting of data).

Data Protection Legislation requires us to have a legal basis for collecting and using your Personal Information. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you.
- **Legitimate interests:** We may use your Personal Information where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your Personal Information where it is necessary for

compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

Where you have explicitly consented at the time we collect your Personal Information or where we have a right to do so, we may also use your Personal Information to let you know about products and services that may be of interest to you and/or inform you about important changes or developments to our services, by e-mail. We will always give you the ability to opt out, and, in any event, whenever we are required to do so under Data Protection Legislation. We will send you emails relating to your personal transactions. You will also receive certain email notifications and marketing emails, from which you may opt out. We may send you service-related announcements on the rare occasions when it is necessary to do so.

If you change your mind about us using your Personal Information in the ways described in this Policy, please let us know by contacting us using the details set out below. You may also opt out of receiving marketing emails from us by following the instructions outlined in any marketing email you receive from us.

How we share your Personal Information

We will never sell your Personal Information. We never post anything to your Facebook, Twitter, or other third-party accounts without your permission.

We will not pass on your Personal Information to third parties except in accordance with this Policy, our Terms of Use, the membership package you selected or where we are required by law to disclose that information.

Where it is necessary for the performance of our contract with you or for our internal business processes, we may share your Personal Information with our suppliers, contractors and/or third-party partners. This may include, for example:

- To employees or partners, to assist with any queries that you may have regarding our services and to allow us to provide our services;
- To partners involved in the processing of funds;
- To partners involved in the processing of identity verifications or compliance checks;
- To service providers that carry out certain functions on our behalf, such as advertising or marketing agencies and analytics providers;
- To any entity that receives funds;
- To a law firm or legal representative that is working on a group or multi-party claim, where you submit information in respect of that claim;
- To owners of cases that you have supported; and
- When the owner of a case you have supported is a charity, we may disclose (with your consent) details such as your name, address and Gift Aid eligibility, so that the charity can claim Gift Aid in relation to your donation.

In addition, it may be necessary to disclose your Personal Information if we are under a duty to disclose your Personal Information in order to fulfil our regulatory, legal or compliance obligations, enforce our Terms of Use and any other agreement, or protect the rights,

property or safety of Spaceling Ltd and our contractors, directors, employees or other personnel. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention.

Our security and data retention measures, and any transfers we make outside the UK

We will take all reasonable effort to ensure that all Personal Information you provide to us and /or that we have collected will be transferred, stored and maintained securely on our server.

We take reasonable steps to protect your Personal Information from unauthorised access and against unlawful processing, accidental loss, destruction and damage. We will only keep your Personal Information for as long as we reasonably require and, in any event, only for as long as the Data Protection Legislation allows.

Unfortunately, the transmission of information via the internet is not completely secure and, although we will take steps to protect your information, we cannot guarantee the security of your Personal Information transmitted via the Platform.

In processing your Personal Information, it may be necessary for us to transfer your Personal Information outside the UK. It may also be accessed by staff operating outside the UK who work for us or for one of our partners or suppliers. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Policy and the Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside the UK. This means that we will only transfer your Personal Information to third parties outside the UK if: (a) that third party is situated in a country that has been confirmed by the UK to provide adequate protection to Personal Information (such as an EU member state); (b) that third party has agreed (by way of written contract such as an International Data Transfer Agreement) to provide all protections to your Personal Information as required by the Data Protection Legislation; or (c) we otherwise have a legal basis for doing so.

Data Retention

We will only retain your Personal Information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about the users of our services for six years after they cease to do so for tax purposes.

In some circumstances we may anonymise your Personal Information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Accessing and updating your Personal Information

You have the right to ask us not to process your Personal Information for marketing or

research purposes. We will inform you (before collecting your Personal Information) if we intend to use your Personal Information for such purposes or if we intend to disclose your Personal Information to any third party for such purposes. You can also exercise the right at any time by contacting us using the details set out below.

You have the right to:

- **Request access to your Personal Information** (commonly known as a "subject access request"). This enables you to receive a copy of the Personal Information we hold about you and to check that we are lawfully processing it.
- **Request correction of the Personal Information that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your Personal Information in certain circumstances.** This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see below), where we may have processed your Personal Information unlawfully or where we are required to erase your Personal Information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your Personal Information where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your Personal Information (including carrying out profiling based on our legitimate interests).** In some cases, we may demonstrate that we have compelling legitimate grounds to process your Personal Information which override your right to object.
- **Request the transfer of your Personal Information to you or to a third party.** We will provide to you, or a third party you have chosen, your Personal Information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Request restriction of processing of your Personal Information.** This enables you to ask us to suspend the processing of your Personal Information in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us using the details set out below.

You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints

Should you have any queries or complaints in relation to how we use your Personal Information, please contact us using the details set out below. Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office regarding such issues.

Our Platform may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these websites or their related policies. Please check these policies before you submit any Personal Information via these websites.

Cookies

A cookie is a small file that is sent to your browser from a web server and is, subject to your consent, stored on your computer. Cookies help us to analyse web traffic and identify which pages of our Platform are being used by you and other users of our Platform. Our Platform also uses cookies to respond to you as an individual so that it can tailor its operations to your needs by gathering and remembering information about your preferences as well as enabling you to login to your account. We use this information to improve the quality of the Platform, and to try and make your browsing experience meaningful.

Cookies may be either "persistent" cookies or "session" cookies. A persistent cookie consists of a text file sent by a web server to a web browser, which will be stored by the browser and will remain valid until its set expiry date (unless deleted by the user before the expiry date). A session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Whether a cookie is a "persistent" cookie or a "session" cookie, they can perform different functions, which can be broken down into four main categories:

- **Strictly Necessary / Essential Cookies:** these are cookies that are required for the operation of a website and/or web platform and which are always enabled because the website and/or web platform won't work properly without them.
- **Analytical / performance cookies:** these cookies allow website and/or web platform operators to recognise and count the number of users of their website and see how users move around the website.

- **Functionality cookies:** these cookies are used to recognise users when they return to a website and/or web platform, enabling website operators to personalise content for users and remember preferences.
- **Targeting cookies:** these cookies record a user's visit to a website and/or web platform, the pages they have visited and the links they have followed, which allows website operators to make their website and the advertising displayed on it more relevant to each user.

A cookie in no way gives us access to your computer, other than information about how you use the Platform and the data you choose to share with us (including data you automatically share with us by way of your browser settings).

We may use aggregate information and statistics for the purposes of monitoring service usage in order to help us develop the Platform and our service and may provide such anonymised aggregate information to third parties, for example content partners and advertisers. These statistics will not include information that can be used to identify you.

Cookies on this Platform

We use both session cookies and persistent cookies on this Platform. We may use the following cookies:

- (1) Essential cookies
- (2) Google Analytics

How we use cookies

Personal Information that we store about you may be linked, by us, to the information stored in and obtained from cookies. We may use the information we obtain from your use of our cookies for the following purposes:

- (1) To recognise your computer when you visit our Platform;
- (2) To track you as you navigate our Platform;
- (3) To improve the Platform's usability;
- (4) To analyse your use of our Platform;
- (5) In the administration of this Platform;
- (6) To personalise our Platform for you, including targeting advertisements which may be of particular interest to you.

Third party cookies

We use Google Analytics to analyse the use of this Platform. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our Platform is used to create reports about the use of the Platform. Google will store this information. Google's privacy policy is available at: [Google Privacy Policy](#).

Blocking cookies

Most browsers allow you to refuse to accept cookies. For example:

- (1) in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector;
- (2) in Firefox you can block all cookies by clicking "Tools", "Options", and un-checking "Accept cookies from sites" in the "Privacy" box.

Blocking all cookies will, however, have a negative impact upon the usability of many websites. If you block all cookies, you will not be able to use the identify feature(s) on this website.

Deleting cookies

You can also delete cookies already stored on your computer:

- (1) in Internet Explorer, you must manually delete cookie files (you can find instructions for doing so at <http://support.microsoft.com/kb/278835>);
- (2) in Firefox, you can delete cookies by, first ensuring that cookies are to be deleted when you "clear private data" (this setting can be changed by clicking "Tools", "Options" and "Settings" in the "Private Data" box) and then clicking "Clear private data" in the "Tools" menu.

Obviously, doing this may have a negative impact on the usability of many websites.

Questions?

If you have questions or suggestions, or if you wish to contact us for any of the reasons set out above, please contact us by email at hello@spaceling.com

Updated May 2026

Registered office address updated June 2023