

WeWork Costa Rica

Privacy Policy

Effective December 2024

1. At WeWork Costa Rica we are committed to protecting your privacy and to ensure that your personal information is collected and used properly, lawfully and transparently.
2. WW COSTA RICA, S.R.L., an entity with legal ID number 3-102-772112, domiciled in San José, Santa Ana, Pozos, one hundred and twenty-five meters west of Momentum Lindora, Lindora Corporate Center, third floor, offices of Garnier and Garnier (“Company”, “we”, “us”, or “our”), and is the owner and operator of the shared working spaces in the territory of Costa Rica trading as WeWork (“Shared Working Spaces”) duly licensed as such in terms of a franchise agreement with WeWork International Ltd (“WeWork Global”).
3. This policy explains how we obtain, use, and disclose your personal information.
4. This privacy policy (“Privacy Policy” or “Policy”) applies to the information collected by the Company in connection with the use of the Company’s services or resources (collectively referred to as the “Services”) either through access of the Company’s website available at www.wework.com/es-LA and use of the services offered therein, as well as other digital assets and social channels and accounts of the Company, including, but not limited to, Facebook, LinkedIn, Instagram, X, TikTok (collectively referred to herein as the “Website”) and / or by the contracting and use of the services offered in the Shared Working Spaces.
5. This Policy details the types of information collected by the Company from its Services’ users, including users of the Website and authorized users of the Shared Working Spaces, whether permanent use or temporary use according to a designated agreement (collectively will be referred to herein as the “Member”), as well as those using the Shared Working Spaces on the Member’s behalf (“Member Users” and together with the Member and Website visitors will be referred to as “user(s)”, “you” or “your”).
6. This Policy further details how the Company collects information, why and how it will use such information, as well as your rights in relation to the Personal Data (as defined below) collected by the Company. Thus, it is highly recommended to review this Privacy Policy prior to accessing our Services or providing us with Personal Data.
7. We collect and process Personal Data in compliance with applicable law, including the Law on the Protection of the Person Against the Processing of Personal Data No. 8968, and its Regulations (“the Law”). As will be detailed in this Privacy Policy, the Company

collects and processes information collected from users for various purposes, including but not limited to, the purpose of providing and managing the Services, Website operation, security, and to respond to users who contact the Company and for marketing purposes.

8. Please note that you are not required by law to provide us with Personal Data (as defined below). Providing Personal Data to us is entirely voluntary, provided however, that we will not be able to provide you with certain Services or information without obtaining your Personal Data (for example, engaging in a Membership Agreement). The Company shall be entitled (however not obligated) to retain and store Personal Data in its database, as detailed under this Privacy Policy, and subject to applicable law.
9. If you provide us with Personal Data, you hereby represent and warrant that the information is provided voluntarily of your own free will, and that the information you provide will be accurate and up to date. To the extent that you provide us with information about another individual (for example, information related to a Member User), you have all the necessary authorizations for the purpose of providing such information. Specifically, it is the Member's responsibility to ensure its Member Users are aware, and, where applicable, provided their consent, to our data collection and use practices, as detailed in this Privacy Policy.

A) Responsible Party

1. We are the Responsible Party (as defined under the Act) of the Personal Data collected through our Services, as detailed under this Privacy Policy.
2. As we operate the Shared Working Spaces in terms of a contractual agreement with WeWork Global (as the franchise owner), WeWork Global is also a Responsible Party in relation to the Personal Data collected through the use of certain services, as shall be detailed in this Privacy Policy. WeWork Global's privacy policy is available [HERE](#), and governs its data collection and use practices as prescribed by its laws within its territory and jurisdiction.
3. We recommend that you carefully read the terms of this Privacy Policy as well as the terms of the WeWork Global privacy policy prior to browsing the Website and using the Services.
4. It is further clarified that this Privacy Policy applies exclusively to the collection of Personal Data by the Company and the Company's practices in this regard. The Company, as a separate and independent legal entity in a different jurisdiction, assumes no responsibility for what is stated in WeWork Global's privacy policy nor its related practices in regard thereto.

B) Policy Amendments

1. We reserve the right to amend this Policy from time to time, at our sole discretion, with or without notice. The most recent version of the Policy will always be posted on the

Website. Any amendments shall be effective upon publication of the revised Privacy Policy. The updated date of the Policy will be reflected in the heading. In the event of, what we may believe, is a material change that will affect your rights related to your Personal Data, we will make efforts to provide applicable notification through the Website, the Member's account or by other means of communication, and such modifications shall be effective within 21 days of such notification. We recommend that you review this Policy periodically to ensure that you understand our most updated privacy practices.

C) The Types of Personal Data We Collect & Purpose of Use

When you access, use or interact with our Services (and depending on the type of interaction with us), we may collect the following types of information:

1. "Non-Personal Data" Meaning aggregated, non-personal non-identifiable information which may be made available or gathered, via your access to, and use of the Services. We are not aware of the identity of the user from which the Non-Personal Data is collected. The Non-Personal Data which is being collected may include your aggregated usage information and technical information transmitted by your device and for example, type of device, browser and operating system, etc. We use Non-Personal Data for the purpose of proper website operation, website security, as well as internal statistics and analysis to improve our Services.
2. "Personal Data" Meaning individually identifiable information, namely information that identifies an individual or may, with reasonable effort, be used to identify an individual. The specific types of Personal Data that we collect as well as the purpose for processing such data, are as follows:
 - 2.1. Shared Working Spaces Engagement: Permanent Basis Where you engage with us for the purposes of a fixed term contract and use of Shared Working Spaces, you will be requested to provide us with certain information (of the Member or the Member User) which includes, among others, the following categories:
 - 2.1.1. Contact details, such as full name, phone number, email and address.
 - 2.1.2. Verification information such as ID number, a copy of an official identification document that includes a photo or other certificate issued by an applicable government authority, and date of birth.
 - 2.1.3. Your position in the organization engaged with us, and additional information regarding your profession.
 - 2.1.4. Payment method; and
 - 2.1.5. Any additional information you will provide through your designated Member account, regarding reservations, guests, Member Users, and the like.
 - 2.2. Note that, all information related to the Member and the Member Users provided as part of, and under the, Membership Agreement, including Member account registration, usage, and any information provided through the Member account, as well as the usage data of the account, is processed and stored on an array of digital

assets used for accounting purposes, customer relationship management functions, space management tools, member platforms, both web based and as apps, and the like (“WeWork Global Platform”) where both the Company and WeWork Global have access and control of such information. Therefore, the aforementioned information will also be subject to the WeWork Global privacy policy.

2.3. Information Collected Regarding the Use of Shared Working Spaces and Member Account Following submissions of a reservation for a Shared Working Spaces: we will collect information you provide through your Member Account, as well as part of the use of the Services offered in the Shared Working Spaces, including with regards to the Member Users’ usage. This information may include, but not be limited to, preferences and uses of Services such as orders, use of equipment and machines, entry and exit controls and logs. We process such data in order to process and fulfill your reservations and orders, including calculation of charges, fees and billing, to enable and approve access to the Shared Working Space, monitoring the entries and exits for, inter alia, security purposes. We may also use this data to improve our Services as well as to offer personalized offers according to the preferences of the Member and Member Users.

2.4. Information Collected when you register for our Events, Lectures and/or Workshops: In the event you voluntarily choose to register for participation on events, lectures or workshops we may offer or promote, from time to time, through various means of communications and media channels, you will be requested to provide us with your contact information such as your full name, email address, phone number, and other details deemed necessary for the purpose, as well as details regarding the Member on whose behalf you are using our Shared Working Spaces. We process such data to manage registrations, approve your participation, send you messages related to the specific event or others similar events we believe that may interest you. In addition, we may use such information to improve our Services, analyze preferences and customize our offers.

2.5. Online Identifier & Usage Data: When you access and interact with our website, we collect certain online identifiers such as Cookie ID, IP address or similar online identifiers transmitted by your device. We may further collect information related to your use and interaction with our website such as directing campaign and URLs, pages viewed, access time and date, and the like. We collect and process this data through our or third parties’ cookies and tracking technologies for analytic, marketing and advertising purposes, including personalized advertising. In addition, we process such data for operational, security and fraud prevention purposes. This information will also typically be used in aggregate form to conduct Website trend and performance analysis.

2.6. Information We Collected When You Contact Us: If you voluntarily contact us, by any means of communication we make available (including email or digital forms), for information or other inquiries, you may be requested to provide us with certain information such as full name, email address, phone number, the name of the organization on whose behalf you are contacting us and your position in such organization, as well as the content of your inquiry that may include additional

information, as provided by you at that instance and at your discretion. We will collect and use this data to address your inquiry, contact you, respond to your inquiry and provide you with the requested information. We may further retain our contact history and correspondence, in the event we find it applicable (e.g., in the event of a future claim, or to improve our Services). In addition, we may use this information to send you marketing materials, subject to applicable law and as described below.

2.7. Newsletter and Mailing List: In the event you sign up to receive our newsletter or other marketing materials, or, subject to applicable law, where you have provided us with your contact information through submission of reservation or other contact communication and haven't opted-out from receiving marketing materials, we may use your contact information, such as name, email address and phone number, to send you promotional messages, offers, updates, and the like, related to our Services, by email, calls or text messages. These messages contain content defined as "direct marketing" under the Act. You may opt-out of receiving our marketing materials at any time by contacting us or otherwise following the instructions included in each communication. We will further store this data to include you, and maintain, our marketing and mailing lists, as well as the "opt-out" list (solely the necessary information for such purpose), to ensure we respect your choice and comply with applicable laws in this regard.

2.8. Shared Working Spaces Brokers: If you wish to collaborate with the Company as a broker of the Shared Working Spaces, you may be asked to register and submit an appropriate application for verification and approval. As part of the application, you will be asked to provide information such as full name, contact information (phone, email, etc.) and additional information that will be required for such collaboration. Also, if your application was approved, when placing a reservation on behalf of your customers, you will be asked to provide information related to such customers, such as name, contact information, the name of the relevant organization and the like. This information is processed on the WeWork Global Platform where both the Company and WeWork Global are considered as Responsible Parties of such information. Therefore, the aforementioned information will also be subject to the WeWork Global privacy policy. We process such data for the purpose of reviewing your application, verifying, and confirming the engagement, managing the engagement as well as managing applications made by you on behalf of your customers.

You represent, warrant and confirm that Personal Data regarding your customers will be provided in accordance with the provisions of applicable law and that you provide this information with such customers' consent.

2.9. Recruitment: In the event you apply for a job position published via our Website, you will be requested to provide information, as part of such application, including your contact information, such as name, email address and phone number, your resume and CV, as well as any additional information you voluntarily choose to provide. We will use this data to process your job application, for our internal recruitment management purposes, for further recruitment steps (e.g., interview), and to enable us to comply with corporate governance and legal and regulatory requirements.

Following the completion of the recruitment process, we may further retain and store the data (including other interactions with us under such process) as part of our internal record keeping, including for legal defense from any future claim, as well as, where we find applicable and subject to applicable law requirements, to contact you in the future for other job position we believe will suit your qualifications. If you are hired by us, your data may be used in connection with your employment and our corporate management.

The provisions of Personal Data you choose to provide as part of your CVs, are provided by you of your own free will and discretion, and you are solely responsible for the scope of the Personal Data you provide. The Company does not require or ask you to provide any sensitive information about yourself, including religion, health, sexual identity or political position, in connection with the recruitment process.

3. In addition to the processing operations detailed above, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts and any other misuse of the Website or the Services, as well as to protect the security or integrity of our databases and the Services and to take precautions against legal liability.

Furthermore, we may be required to process your Personal Data in order to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency, as well as to comply with applicable law requirements.

4. **How We Collect Your Data:** We may collect information either automatically or voluntarily provided by you (for example, when you submit a reservation, using the Shared Working Spaces, contact us or providing information regarding the Member Users). Automatic collection of information is usually made through the use of cookies (as detailed below) and similar tracking technologies.
5. **Data Sharing – Categories of Recipients:** We may share your Personal Data with third parties, including with trusted partners or service providers, for the purposes detailed below:

5.1. **Service Providers:** We may disclose Personal Data to our trusted agents and service providers and business partners, (including, but not limited to, our Cloud service provider, marketing service provider, customer support, and the like) so that they can perform requested services on our behalf. We share your data with such third-party entities, for the purpose of storing such information on our behalf, or for other processing needs. These entities are prohibited from using your Personal Data for any purposes other than providing us with requested services.

5.2. **Compliance with Applicable Law, Legal Proceedings and Prevent or Mitigate Damage:** We may share the information collected from or related to you if or when required or permitted under applicable laws, in accordance with the instructions of a competent authority or a judicial order as well as in the event of a dispute, claim, demand or legal proceedings that will be conducted between the Member, Member User or whom on his behalf and the Company or whom on its behalf and in addition, in the event that the Company believes sharing or disclosing Personal Data is

necessary in order to prevent or mitigate damage to third parties, other Members, its employees or customers, at the Company's discretion.

5.3. Enforcement of Our Rights and Security Detections: We may disclose Personal Data to enforce our policies (including with regards to use of the Shared Working Spaces), agreements and terms of use, as well as defend our rights, including the investigation of potential violations thereof, alleged illegal activity or any other activity that may expose us, you, or other users to legal liability, and solely to the extent required. In addition, we may disclose Personal Data to detect, prevent, or otherwise address fraud, security, or technical issues, solely to the extent required.

5.4. Compelled Disclosure: We may share Personal Data, in the event your request us to do so. In such event, the provisions of your Personal Data will be subject to such third parties' policies and practices only, and the company shall bear no responsibility or liability in this regard.

5.5. Acquirer of Our Business & Corporate Reorganization: We may share Personal Data, in the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale, including in the process of negotiation). In the event of the above, our affiliated companies or acquiring company will assume the rights and obligations as described in this Policy.

5.6. WeWork Global as detailed above, Personal Data collected as part of the engagement in a Member Agreement and use of certain Services will be transferred and stored on the WeWork Global Platform.

5.7. Cookies Policy We or our third-party service providers may use cookies and other similar tracking technologies or methods of web and mobile analysis to gather, store, and track certain information related to your access of, activity and interaction with our website.

A "cookie" is a small piece of information that a website assigns to your device while you access such website. Cookies are very helpful and may be used for a variety of different purposes. These purposes include, among other things, proper operation of our Website, Website security, enabling automatic activation of certain features, remembering your preferences. Cookies are also used to gather statistic and improve our Services, as well as to customize your experience and for advertising purposes (including personalized advertising when you visit other websites or social networks). You can use your browser settings to block or remove cookies at any time (as further detailed below).

6. Cookies opt-out: You are able to control the use of cookies while you browse our website through the cookies settings available at the footer of our Website. Furthermore, most browsers will allow you to erase cookies from your computer's hard drive, block acceptance of cookies, or receive a warning before a cookie is stored. However, if you block or erase cookies your online experience may be limited.
7. Data Retention: We will retain Personal Data for as long as needed to comply or fulfill the purpose of collection or for a longer period, if required to comply with our legal, regulatory, tax, accounting, internal business or policy requirements or in order to protect the Company's legitimate interests.

8. **Security Measures and International Data Transfer:** We strive to protect the Personal Data we process from unauthorized access, alteration, disclosure, or destruction. We have implemented physical, technical, and administrative security measures in accordance with industry standards, however, we cannot prevent all security incidents. Subject to the Company's legal obligations regarding the security of Personal Data, the Company does not guarantee that the Website or its systems will be completely immune from unauthorized access to the information stored therein. We may process or store Personal Data both in Costa Rica and in other countries. You hereby acknowledge and confirm that by using the Website or Services, your information may be transferred, stored and processed on the Company's servers outside of Costa Rica. The transfer of Personal Data outside the borders of Costa Rica will be done in accordance with the provisions of applicable law.
9. **Links to Other Sites:** Please be aware that our website may contain links to other third parties' sites ("Linked Sites"), including sites maintained by suppliers of certain products or benefits offered to our members, and to the WeWork Global Platform. These Linked Sites are not under Company's control or responsibility and are not governed by this Privacy Policy but by such third parties' privacy policies.
10. **Users Rights:**
 - 10.1. We respect your privacy and your rights to control your Personal Data. We allow you to exercise certain choices, rights, and controls in connection with your Personal Data. Depending on your relationship with us, your jurisdiction and the applicable data protection laws that apply to you, you have the right to control and request certain limitations or rights to be executed.
 - 10.2. You have the right to access and inspect your Personal Data stored by the Company, by sending us your request to: escazu@weworkcr.com Subject to applicable law provisions if you found that the Personal Data is incorrect or not updated, you can request its correction or deletion.
 - 10.3. In addition, you can delete or update certain Personal Data through your Member account.
 - 10.4. If you are not interested in receiving our marketing materials and promotional messages, you may, at any time, notify us through the various communication channels detailed under this Policy or in accordance with the instructions that may be contained in the message itself (i.e., a link to "unsubscribe"). Also, if the information stored by the Company is used for the purpose of personally addressing an individual, based on its personal and specific characteristics, you have the right to request us to delete such information.
 - 10.5. Please note, after a request to be removed from the above mailing list, the Company will not send you marketing messages, however, the Company may continue to send you messages with respect to the Services (for example, a response to your inquiry, invoices, and other similar reasons).
 - 10.6. Further, please note that Personal Data necessary for the Company to manage the Services and operate its business – including records of actions you have performed – will be kept by us according to applicable law but will no longer be used for direct marketing purposes.

10.7. The exercise of your rights related to Personal Data collected and stored by WeWork are also subject to the WeWork Global privacy policy

10.8. When submitting a request to access, inspect, update, correct or delete your Personal Data, and for the purpose of protecting the privacy of individuals, the Company may request certain details for identification purposes before responding to or fulfilling the request.

11. Eligibility and Age Limitation: The use of our Services is intended and permitted only for individual's above legal age. If you are under the legal age or are not of legal competence, for whatever legal reason, you are required not to use the Services nor provide us with Personal Data. Without derogating from the above and subject to applicable laws, if we become aware that we have collected Personal Data related to minors, we will make efforts to discard such information without delay.
12. Applicable Law & Jurisdiction: Any dispute arising in connection with this Privacy Policy shall be exclusively governed by and construed in accordance with the laws of Costa Rica.
13. Contact Us: If you have questions or comments about our data collection practices and this Privacy Policy, you may contact us using the communications means below:
 - Online contact us forms made available through the Website; or
 - Email: escazu@weworkcr.com
 - Phone: +5064081-9777

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