

Syncs.bio Privacy and Cookie Policy

Last updated: November 2023

Welcome to Syncs.bio

We are committed to respecting your privacy and protecting your personal data. This Syncs.bio Privacy and Cookie Policy ("Policy") sets out how we use data relating to you and applies to all use of your personal data by Syncs App Ltd. a private company incorporated and registered in England and Wales with company number 15902605 whose registered office is at 483 Green Lanes, London, N13 4BS ("we", "us" or "our").

This Policy sets out the basis on which any personal data we collect from you, or that you provide to us through our mobile/tablet applications or our website (<https://syncs.bio/>) (together, "Syncs.bio") will be processed by us. This Policy applies to all users of Syncs.bio, including individuals and businesses who use Syncs.bio to create and manage their content, products, events, tickets, experiences, subscriptions, and other offerings ("Services"), and their customers or users who engage with the Services ("End Users"). Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

We will only collect and process information about you in accordance with this Policy and will only use information collected about you in accordance with applicable data protection laws, including the EU General Data Protection Regulation 2016 ("EU GDPR"), the EU GDPR as it forms part of the laws of England, Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 ("UK GDPR," and together with the EU GDPR, the "GDPR"), and the UK Data Protection Act 2018.

You have the right to object to the processing of your personal data, including where your personal data is being processed for direct marketing purposes. Further information on this right, and your other rights, is set out below.

1. WHAT IS OUR ROLE WHEN PROCESSING PERSONAL DATA?

1.1 Where we decide the purposes and means for the processing of your personal data, we are the "controller" for the purposes of the GDPR. This means we are generally a controller for the following:

1.1.1 Processing of personal data in connection with the operation, hosting, and management of your Syncs.bio account and the provision of Syncs.bio's services to you; and

1.1.2 Processing the personal data of individuals who contact us via our support email address, sign up for the Syncs.bio waiting list or Syncs.bio newsletter/marketing/update communications, or use the Syncs.bio website (<https://syncs.bio/>).

1.2 If you are using our platform to manage your own content or services, there may be instances where you decide the purposes and means for the processing of personal data, and we simply process that personal data according to your instructions and on your behalf. In such circumstances, you are the "controller" and

we are the “processor.” This means we are generally a processor for the processing of personal data through your individual Syncs.bio profile page, for example, when your customers sign up to a newsletter, click on links to purchase merchandise, or interact with you on your profile page.

1.3 This Policy addresses the processing of personal data that we undertake as a controller. Please refer to the privacy policies available from within any profile page for further details of the processing of your personal data by the profile owner as a controller.

1.4 While users are contractually obligated to comply with all applicable data protection laws, we do not accept any responsibility or liability regarding how users handle personal data.

2. HOW WE COLLECT AND USE YOUR PERSONAL DATA

2.1 The table below explains what data we may collect, how we use it, and which recipients it might be shared with.

Your data	How we use it	Recipients
Account Information (information provided by you when creating and using an account on Syncs.bio) • Full name • Age • Gender • Country • Company (if applicable) • Username and password • Contact details (email, address, phone number) • Billing information including card details, and details relating to your payment for Syncs.bio services (including subscriptions where relevant). • Syncs.bio Services you make use of (including profile building, content management, and other tools offered by Syncs.bio). • Social media and website usernames, URLs, and/or handles	Processing of Your Information We process this information to provide our services to you and to facilitate your access to Syncs.bio, for example, to: • Register your account. • Manage your account. • Ensure our services function properly and deliver the features promised. Provided we have the right to do so, we may also process certain of this information (such as your name and the services or content you make available on Syncs.bio) in Syncs.bio marketing and promotional materials. Finally, we may process such information to monitor and enforce compliance with our terms of service and usage rules, and to investigate potential breaches or infringements of our usage rules, to ensure that Syncs.bio remains a safe and friendly environment for all users. Legal Basis We process this information in accordance with the terms of our contract with you (the Syncs.bio Terms of Service). For example, we need your contact details to create your account and to process payments you make for Syncs.bio services.	The information that you upload to your profile on Syncs.bio will be publicly available for others to view. Similarly, to the extent that we use certain aspects of your (limited) personal data in our marketing and promotional activities, this information will also be publicly available.

Your data	How we use it	Recipients
	Additionally, we rely upon our legitimate interests for this processing activity, being our interests in promoting the success of our business by: (i) providing you with quality service, (ii) understanding the users of our services; and (iii) (in the case of processing in connection with our marketing and promotional activity) attracting new users to our platform. Where we process this information to monitor and enforce compliance with, and investigate breaches of, our terms of service and usage rules, we do so on the basis of our legitimate interests in ensuring that Syncs.bio remains a safe and friendly environment for all users. More Information You may be required to provide us with certain information for us to register your account. Users are not able to access Syncs.bio services without an account.	

Your data	How we use it	Recipients
Information You Include on Your Syncs.bio Account Profile This includes any information you choose to include in your Syncs.bio account profile, such as: • The services or content you make available on your profile. • Third-party links you add to your profile. • Qualifications, experiences, and biography information you choose to provide. • Pictures and audiovisual material you upload to Syncs.bio, such as your account profile picture. • •		

Your data	How we use it	Recipients
Instagram Access Token: Long-term token obtained via the Instagram API. Learn more Information on Recent Posts: Links to the latest 12 photos, the number of likes, and comments on those photos. User Login: The Instagram username. Follower Information: The number of Instagram followers.	Purpose of Data Use: Displaying Posts: We use the collected data to display the user's latest uploaded posts on their personal page . This includes showing the photos, likes, comments, and follower count. Token Renewal: We store the long-term token and automatically renew it to ensure continuous display of the latest posts on the user's page.	Data Sharing: No Data Sharing: We do not share any collected data with third parties. All data is used solely for the purposes described above and is stored in a secure databas

Methods of Data Collection:

We collect data through the Instagram API after the user connects their account and provides consent. We only store the long-term access token, which is used to retrieve information on recent posts.

Legal Basis for Data Processing:

We process the data based on the user's consent, given when they log in through Instagram.

Security Measures:

We apply encryption to protect user data and conduct regular security checks to prevent unauthorized access.

Your data	How we use it	Recipients
Newsletter, SMS, and Marketing Messages (Information provided by you when signing up for our newsletter or marketing emails) • Name • Email address • Mobile number • Other information collected and clearly identifiable to you at the point of your signing up for our newsletter, marketing, or feature update emails.	Legal Basis: Consent-Based Mailing Lists We process your data to make suggestions and recommendations to you and other users of Syncs.bio about: (i) news and updates relating to us, our partners, products, services, and content; (ii) content, goods, services, experiences, and other offerings available in or from Syncs.bio; and (iii) other promotional activities and events we think may be of interest. In such circumstances (and provided the ‘soft opt-in’ – see below – does not apply), we process your data on the basis of your consent. Legal Basis: ‘Soft Opt-In’ Mailing Lists In some instances (such as with some of our existing users, or where users are incorporated as a business) the law may permit us to process your personal information in order to send information to you via marketing messages that we believe may be of interest to you and/or your business, based on our legitimate interests in marketing our activities and promoting the success of our business and Syncs.bio, including its content, products, and services. We may process your information for this purpose. If the information is not of interest to you, you can opt out at any time by contacting us using the details outlined in the ‘Contact Us’ section below.	We may share your data with email and marketing message vendors to assist us in sending marketing communications and newsletters.

Your data	How we use it	Recipients
	More Information You are not required to provide us with this information, but if you do not, we may not be able to provide you with our newsletter or marketing emails.	

Your data	How we use it	Recipients
Support / Enquiry Information (Information we receive when you get in touch with us for support) • Name • Contact details (email, address, phone number) • Other personal data you choose to send to us • Mailing preferences	We process this information to respond to your support requests and other enquiries. Legal Basis We process this information: • In accordance with the terms of our contract with you (the Syncs.bio Terms of Service) where we need this information to provide our services to you. • In pursuit of our legitimate interests in responding to your enquiry, including: (a) our interest in ensuring the smooth operation of our business and services; and (b) our interest in understanding our users and improving our services by taking onboard your feedback. • (In respect of mailing preferences information) because we are required to do this by law to the extent we wish to send direct marketing to you. More Information You are under no obligation to provide any of this information, but it may not be possible for us to respond to your enquiry if you do not	We may share this information with vendors who assist us with managing customer services enquiries.

Your data	How we use it	Recipients
Website Analytics (Collected from your device and interaction with the Syncs.bio website [https://syncs.bio/]) • How often you use Syncs.bio. • Which content, pages, and application screens you visit, and which features you use. • Your IP address and device identifiers communicated by your device. • Device and browser operating system, version, make, and model.	We may process this information (on its own or together with your account information) so that we can: (i) understand usage of our services and improve them; (ii) identify and resolve problems or bugs; and (iii) develop new services or content that we believe will be of greatest interest to you. Legal Basis We will obtain your prior consent before undertaking this processing. More Information You are under no obligation to provide your consent for our processing of this information.	We use Google Analytics (https://support.google.com/analytics/answer/6004245) to help us understand how our website is used. We may share this information with our trusted business partners or with Syncs.bio users in an aggregated, non-personally identifiable form. Please see our Cookie Policy for more information about our use of cookies and similar technologies.

Your data	How we use it	Recipients
Account Analytics (Collected from your device and from you when you interact with your Synics.bio account) - Your use of your account: when you are active on your account, devices used to access your account, and the country from which you access your account. - Conversion analytics: whether you signed up for your account after seeing a Synics.bio advertisement, and whether you convert your free trial of Synics.bio into a paid subscription.	We process all other account analytics data so that we can: (i) understand and improve the usage of our services and marketing; (ii) identify and resolve problems or bugs; and (iii) develop new services and marketing content that we believe will be of greatest interest to you. Legal Basis Where such data is collected using cookies or similar technologies, our processing is based on your consent. You may withdraw your consent at any time. More Information You are under no obligation to provide your consent for our processing of this information.	We use the following tools to help us understand how our services are used: Google Analytics (https://support.google.com/analytics/answer/6004245) Segment (Privacy Tools Overview Segment Documentation) Mixpanel (Mixpanel: Event Analytics for Mobile, Web & More)
Competition and Promotion Related Entry Information (Information we receive when you enter a competition or prize promotion with us, such as over email or social media) - Name (and/or your unique social media username) - Contact details so we can process your entry (such as email, address, phone number if we need to send you a prize) - Information submitted as part of your entry	We process this information for the purposes of managing and fulfilling the objectives of the competition or promotion. Legal Basis We rely on the legal basis of performance of a contract for this processing activity, based on the applicable terms governing the competition or promotion that we may make available. More Information You are under no obligation to provide this information, but we may be unable to process your entry into the competition or prize promotion if you choose not to.	

Your data	How we use it	Recipients
Push Notifications (When your device sends you a notification of an activity in Syncs.bio applications, such as about new functionality available for use on your profile) • Device identifiers communicated by your device • Push notification preferences	Where required by law, we will obtain your prior consent before sending you push notifications through our applications. In some cases, you may provide the foregoing consent at a 'device level,' and/or the option for you to consent to the notifications may be prompted through your device rather than our application. For most mobile and tablet devices, push notifications can be disabled in your device settings.	

3. YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

3.1 You have the following rights in respect of your personal data:

- Ask us for a copy of personal data we are processing about you.
- Ask us to correct inaccuracies in your personal data.
- Ask us to restrict, stop processing, or to delete your personal data.
- Ask us for a machine-readable copy of your personal data, which you can use with another service provider. Where it is technically feasible, you can ask us to send this information directly to another provider if you prefer.
- Object to our processing of your personal data.
- Object to the use of your personal data for direct marketing.
- (Where we rely on your consent to process your personal data) withdraw your consent at any time.
- Make a complaint to a data protection regulator. You may contact the UK regulator at: <https://ico.org.uk/concerns/>.

3.2 To make a request in relation to any of the aforementioned rights, please send your request to us through our dedicated customer services team at: support@syncs.bio. We aim to comply without undue delay, and within one month at the latest, in response to any requests submitted by you to us in connection with your rights.

4. DISCLOSURE OF YOUR PERSONAL DATA

4.1 Other than as set out under 'Recipients' above, we may disclose your personal data to:

4.1.1 Our group, subcontractors, and application stores. We keep your personal data confidential, but may disclose it to any member of our corporate group, our personnel, or subcontractors insofar as it is reasonably necessary for the purposes set out in this Policy, and on the legal basis of meeting our obligations under our contract with you, or our legitimate interests in outsourcing certain functionality to subcontractors or corporate group members.

4.1.2 Government authorities. In addition, we may disclose your personal data to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and to establish, exercise, or defend our legal rights (including providing information to others for the purposes of fraud prevention). In each case, we do so on the basis of our legal obligations.

4.1.3 Potential acquirers or investors. If we are involved in a merger, acquisition, or sale of all or a portion of our business or assets, personal data we hold may be shared based on the legitimate interests of us, our shareholders, customers, and other parties to a transaction, unless those interests are outweighed by prejudicial impacts upon you.

4.1.4 Enforcement. We may also disclose your personal information to third parties in order to enforce or apply the terms of agreements, to investigate potential breaches, or to protect the rights, property, or safety of us, our personnel, customers, or others. We do this on the legal basis of our legitimate interests in ensuring our services are used lawfully and in accordance with our policies, and in ensuring the rights of others are not negatively impacted by anyone's use of our services.

4.1.5 Suppliers and service providers. We may use a range of suppliers and service providers to operate our business.

4.2 In addition to the above, Syncs.bio may contain links to third-party functionality, apps, or websites (such as, for example, the YouTube video player). These third-party functions, apps, or websites may have their own privacy policies, and we recommend that you review them. We do not accept any responsibility or liability for the privacy practices of such third parties, and your use of their services is at your own risk.

5. DATA RETENTION

5.1 We will only hold data about you for as long as necessary, bearing in mind the purpose for which that data was collected, or as otherwise described in this Policy.

5.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data, and whether we can achieve those purposes through other means, as well as the applicable legal requirements.

6. SECURITY

6.1 We will take commercially reasonable, appropriate technical and organizational measures to ensure a level of security appropriate to the risk that could be encountered via the use of Syncs.bio, taking into account the likelihood and severity of those risks that might pose to the rights and freedoms of Syncs.bio users.

6.2 In particular, we will take precautions to protect against the accidental or unlawful destruction, loss, or alteration, and unauthorized disclosure of or access to the personal data transmitted, stored, or otherwise processed by us.

7. INTERNATIONAL DATA TRANSFERS

7.1 We are primarily based in the United Kingdom and use servers and service providers located in multiple jurisdictions.

7.2 Where we use service providers located outside the United Kingdom, there are agreements in place to ensure that personal data is processed using appropriate safeguards that meet the requirements of data protection laws. Such appropriate safeguards may include standard data protection clauses adopted by a data protection regulator and approved by the UK Data Protection Regulator and/or European Commission, such as the European Commission's standard contractual clauses.

7.3 If you would like to find out more about these safeguards or if you have any other queries or comments in relation to this Policy, please let us know by contacting us by email: support@syncs.bio.

8. GENERAL

8.1 If you follow a link from Syncs.bio to any third-party websites, please be aware that those websites may have their own privacy policies. We do not accept any responsibility or liability for those websites. Please check the policies of any third-party websites before submitting any personal data to those websites.

8.2 We may make changes to this Policy in the future, which will be posted on this page. You should check this page from time to time to ensure you are aware of any changes. Where appropriate, we may notify you of changes by email or a pop-up message in your Syncs.bio account.

9. CONTACT US

All questions, comments, or enquiries should be directed to us by email: support@syncs.bio.

COOKIE POLICY

Last updated: June 2023

Cookies are small text files that are placed on your computer or mobile/tablet by websites that you visit or applications you use. They are widely used to make websites work or work more efficiently, as well as to provide information to the owners of the site. The table below explains the cookies and analytics tools we use and why.

Please note that users may place their own cookies and analytics tools on your devices via their Syncs.bio profile page. Such cookies and analytics tools will process your personal data and may be used to, among other things, serve advertising to you on third-party services and/or infer details about you based on your behavior across channels linked to the user's Syncs.bio profile page. Please refer to the individual user's own privacy policies for further information on their practices in this regard. Syncs.bio does not control such user-placed cookies or access information collected by them as a controller (see the Syncs.bio privacy policy above for further detail on when Syncs.bio acts as a controller and processor).

Our application uses the Spotify API to search for publicly available track information. We do not collect or process any personal data from users during these operations.

Our application uses the Apple Music API to search for publicly available track information. We do not collect or process any personal data from users during these operations.

Cookie	Duration	Purpose/ Third Party Access
Google Analytics	180 Days	This cookie is used to collect information about how users interact with Syncs.bio. We use the information to compile reports and to help us improve our services. The cookie collects information on the number of users, where users have come to the Syncs.bio website from, and the webpages or app screens they visited. We do not facilitate the merging of personally identifiable information with non-personally identifiable information. We collect the following information through Google Analytics: • Bounce Rate • Sessions • Average Pages per session • Where our users come from (e.g., organic, social, referral, email) • Device usage • Age range • User interests • Other interests of the users • Time of day that the website is used • Location • Page Views • Entrances and Exits • Average time on page • Returning visitors vs. New visitors • Downloads • Social Shares Read Google's overview of privacy and safeguarding data here.

Cookie	Duration	Purpose/ Third Party Access
Cookie Control	Persistent	This cookie will be set on your device for the purpose of remembering your cookie consent preferences. This cookie will be set even if you reject all other cookies in the cookie consent tool, so that we know not to place any other cookies on your device during your visits to Syncs.bio.
Preferences	One month	To remember information about you such as your preferred language and configuration.

HOW DO I CHANGE MY COOKIE SETTINGS

Most web browsers allow you to control cookies through their settings. Below are links to resources for managing cookies on popular browsers:

- [Microsoft Edge cookies information](#)
- [Internet Explorer cookies information](#)
- [Chrome cookies information](#)
- [Firefox cookies information](#)
- [Safari cookies information – mobile devices and desktops](#)
- [Opera cookies information](#)

To find information related to other browsers, visit the browser developer's website.

For information on how to opt out of the collection and use of information for ad targeting, visit <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>.