

Syntropy States Privacy Policy

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The Syntropy Partnership LTD (registered number 12741219) (“us”, “our”, “we”, “Syntropy”) is the controller of your personal data collected through <https://www.syntropystates.com/> (the “Website”). Syntropy is committed to protecting and respecting your privacy.

This privacy policy (the “Policy” or “Privacy Policy”) sets out the types of personal data we collect and use when you access and visit the Website and how we may use that data.

1. Introduction

This Privacy Policy explains who we are, why and how we process personal data collected through your use of the Website and, if you are the subject of any of the personal data concerned, what rights you have and how to get in touch with us if you need to.

When you supply any personal data to us we have legal obligations towards you in the way we use that data. For ease of reading, we have divided this Policy into several sections:

1. Introduction

2. What information can we collect?

3. Special Category Data

4. How is your personal information collected?

5. How and why do we use and share your personal information?

6. For how long do we keep your personal information?

7. Security

8. International Data Transfers

9. Your Rights

10. Contact Details

It is important that you read this Policy together with any other privacy notice or fair processing notices that we may provide on the Website at or around the time that we collect or process personal data about you (for example, fair processing notices that we may display to you at the time that you sign up to receive e-mail updates from us) so that you are fully aware of how and why we are using that data.

This Policy supplements other notices on the Website and is not intended to override or replace them.

By visiting or otherwise using the Website, you agree to its terms (including as amended from time to time) and this Privacy Policy. If, for any reason, you do not agree to the terms of this Policy, please stop using this Website.

We reserve the right to revise or amend this Policy at any time to reflect changes to our business or changes in the law. Where these changes are significant we will endeavour to let users of the Website know. However, it is your responsibility to check this Policy before each use of the Website – for ease of reference the top of this Policy indicates the date on which it was last updated.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Please note that the Website collects and processes personal data of children under the age of 18 (each “Child” or “Children.”) Where we rely on performance of a contract as the lawful basis for processing Children’s data, we shall consider whether the Child is capable of understanding the obligations it is entering into. Where we rely on legitimate interest as the lawful basis for processing of Children’s data, we shall give due weight to the additional risks to Children of processing of their personal data. Where we rely on consent as the lawful basis for the processing of Children’s data and any Child is under the age of 13 years, we shall seek the consent of a parent or guardian to process the personal data.

2. What information can we collect?

What is personal data?

Where this Policy refers to ‘personal data’ it is referring to data about you from which you could be identified – such as your name, your date of birth, your contact details and even your IP address.

By law, all organisations who process your personal data in the UK are obliged to process your personal data in certain ways and to ensure that you are given an appropriate amount of information about how they use it. You also have various

rights to seek information from those organisations about how they are using your data, and to prevent them from processing it unlawfully. For more information about these rights, please see the "**Your Rights section 9**" of this Privacy Policy.

What types of data we collect from you when you use the Website

The personal data we collect from you may include:

- Identity Data which includes your name, date of birth and gender.
- Contact Data which includes your e-mail address, billing address and delivery address.
- Financial Data which includes your bank account and payment card details.
- Transaction Data which includes details about payments to and from you and other details or services you have purchased from us.
- Technical Data which includes your IP address, your login data and browser type and version.
- Profile Data which includes your username and password, your interests, preferences, feedback and survey responses.
- Usage Data which includes information about how you use the Website.
- Marketing and Communications Data which includes your preferences in receiving marketing from us and our associated third parties.

3. Special Category Data

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

4. How is your personal information collected?

Direct interactions

When you use the Website to register as a member, complete a form, contact us by email or by post, request marketing be sent to you, provide payment details, order a product or service, participate in social media functions, take part in an online survey, enter into competitions, or browse from page to page, we may collect, store and use the personal data that you disclose to us.

Automated technologies or interactions

We shall also collect information about you when you visit and interact with the Website through the use of technologies such as cookies. The following are examples of information we may collect:

- information about your device, browser or operating system;
- your IP address;
- information about links that you click and pages you view on the Website;
- length of visits to certain pages;
- subjects you viewed or searched for;
- page response times;
- records of download errors and/or broken links;
- page interaction information (such as details of your scrolling, clicks, and mouse-overs);
- methods used to browse away from the page; and
- the full Uniform Resource Locators (URL) clickstream to, through and from this Website (including date and time).

We use the data described above for several different reasons. First we use it to ensure that the Website works properly and that you are able to receive the full benefit of it. Secondly, we use the data to monitor online traffic and audience participation across the Website. Thirdly, we use the data to gain insights about user preferences and interests. We undertake these activities because we have a legitimate interest in doing so.

For more information on this kind of technology, please see our Cookies Policy.

Third parties or publicly available sources

We also partner with third parties who may collect personal data including usage or statistical data through your use of the Website (including, for example, business partners, sub-contractors in technical support and delivery of services, advertising

networks, analytics providers, search information providers, credit reference agencies).

Updating your information

If you want to update the information you have previously given to us, you can contact us at info@syntropystates.com.

5. How and why do we use/share your personal data?

Lawful basis for processing your information

We will only use your personal data when the law allows us to. Most commonly we will use your personal data in the following circumstances:

- Where you have asked us to do so, or consented to us doing so (although consent is not necessarily required for us to process your personal data);
- Where we need to do so in order to perform a contract we have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

Here are some examples about how we may use the information we collect about you and the lawful basis we rely on to do so.

Activity	Examples of the types of personal data we may collect	Lawful basis for processing.
To register you as a customer and deliver goods and services to you.	Identity, contact, financial, and transaction information.	Performance of a contract with you.

To manage our relationship with you including notifying you of any changes to the Website or services provided on the Website.	Identity, contact, profile and marketing communications information.	Performance of a contract with you.
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To administer and protect our business and this Website (including troubleshooting, data analysis and system testing.) Identity, contact and technical information. Performance of a contract with you.

To deliver relevant Website content and advertisements to you.

Identity, contact, profile, usage, marketing and communications and technical information. Marketing and Communications.

To use data analytics to improve the Website, services, marketing, customer relationships and experiences. Technical and usage information. Marketing and Communications.

Marketing and Communications

We may use your personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting Out of Marketing

To unsubscribe from marketing emails at any time, please click on the unsubscribe link at the bottom of any marketing email. You may also contact us or the third party directly if you do not wish to receive any marketing materials from us or them.

Sharing your personal data

Depending on how and why you provide us with your personal data we may share it in the following ways:

- with selected third parties to which we sub-contract to provide various services and/or aspects of the Website's functionality, such as where third party plugins provide functionality such as message boards or image hosting services (see "**Service Providers**" in the next section); and
- with analytics and search engine providers that assist us in the improvement and optimisation of this Website as described above.

We may also disclose your personal data to third parties in the following events:

- if we were to sell or buy any business or assets, in which case we might disclose your personal data to the prospective seller or buyer of such business or assets as part of that transaction;
- if Syntropy or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers and contacts will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or if we are asked to provide your details to a lawful authority in order to aid in the investigation of crime or disorder; and/or
- in order to enforce or apply the Website's terms of use or terms and conditions of sale; or to protect the rights, property, or safety of our company, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Service Providers (Data Processors)

Our service providers provide us with a variety of administrative, statistical, and technical services. We will only provide service providers with the minimum amount of personal data they need to fulfil the services we request, and we stipulate that they protect this data and do not use it for any other purpose. We take these relationships seriously and oblige all of our data processors to sign contracts with us that clearly set out their commitment to respecting individual rights, and their commitments to assisting us to help you exercise your rights as a data subject. We do not allow our third-party service providers to use your personal data for their own purposes. The following is a list of our major service providers:

- Google Analytics
- Namesco

Links to third party sites

Where we provide links to third party websites, plug-ins and applications that are not affiliated with Syntropy such sites are out of our control and are not covered by this Policy. If you access third party sites using the links provided, the operators of these sites may collect personal data from you that could be used by them, in accordance

with their own privacy policies. Please check these policies before you submit any personal data to those websites.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the associated website may become inaccessible or not function properly. For more information about the cookies we use, please see **COOKIE POLICY**.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. For how long do we keep your personal data?

We will hold your personal information on our systems only for as long as required to provide you with the services you have requested, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.

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 unauthorised 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, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including contact, identity, financial and transaction Data) for six years after they cease being customers for compliance purposes. In some circumstances you can ask us to delete your data: see 'Your Rights ' below for further information, although this may not always be possible if we are obliged to retain the data for compliance purposes.

In some circumstances we may anonymise your personal data (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.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature.

7. Security

Syntropy takes the protection of your information very seriously. We have put in place technologically and organisationally appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. International Data Transfers

Please note that some of our service providers may be based outside of the UK. These service providers may work for us or for one of our suppliers and may be engaged in, among other things, the fulfilment of your request for information and the provision of services or support services.

Where we transfer your data to a service provider that is outside of the UK we seek to ensure that appropriate safeguards are in place to make sure that your personal data is held securely and that your rights as a data subject are upheld. We will only

transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

By submitting your personal information, you agree to this transfer, storing or processing. If you would like more information about how the mechanism via which your personal data is transferred, please contact info@syntropystates.com.

9. Your Rights

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance info@syntropystates.com.

As a data subject you have a number of rights in relation to your personal data. Below, we have described the various rights that you have, as well as how you can exercise them.

Right of Access

You may, at any time, request access to the personal data that we hold which relates to you (you may have heard of this right being described as a "subject access request").

Please note that this right entitles you to receive a copy of the personal data that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal data lawfully. It is not a right that allows you to request personal data about other people, or a right to request specific documents from us that do not relate to your personal data.

You can exercise this right at any time by writing to us by contacting us and telling us that you are making a subject access request. You do not have to fill in a specific form to make this kind of request.

Your Right to Rectification and Erasure

You may, at any time, request that we correct personal data that we hold about you which you believe is incorrect or inaccurate. You may also ask us to erase personal data if you do not believe that we need to continue processing it including storing it (you may have heard of this right described as the "right to be forgotten").

Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with is correct. Further, we are not always obliged to erase personal data when asked to do so; if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to erase we will tell you what that reason is at the time we respond to your request.

You can exercise this right at any time by contacting us and telling us that you are making a request to have your personal data rectified or erased and on what basis you are making that request. If you want us to replace inaccurate data with new data, you should tell us what that new data is. You do not have to fill in a specific form to make this kind of request.

Your Right to Restrict Processing

Where we process your personal data on the basis of a legitimate interest (see the sections of this Policy which explain how and why we use your information) you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

You may also ask us to stop processing your personal data (a) if you dispute the accuracy of that personal data and want us verify that data's accuracy; (b) where it has been established that our use of the data is unlawful but you do not want us to erase it; (c) where we no longer need to process your personal data (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. We will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it.

You can exercise this right at any time by writing to us using the contact details set out here and telling us that you are making a request to have us stop processing the relevant aspect of your personal data and describing which of the above conditions you believe is relevant to that request. You do not have to fill in a specific form to make this kind of request.

Your Right to Portability

Where you wish to transfer certain personal data that we hold about you, which is processed by automated means, to a third party you may write to us and ask us to provide it to you in a 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.

Your Right to object to processing

You may object to processing of your personal data where we rely on legitimate interest for processing that personal data. We will comply with your request unless we have a compelling overriding legitimate interest for processing or we need to continue processing your personal data to establish, exercise or defend a legal claim.

Your Right to stop receiving communications

Where we send you e-mail marketing communications (or other regulated electronic messages) you have the right to opt-out at any time. You can do this by using the 'unsubscribe' link that appears in the footer of each communication (or the equivalent mechanism in those communications).

Alternatively, if for any reason you cannot use those links, or if you would prefer to contact us directly – you can unsubscribe by writing to us at info@syntropystates.com and telling us which communications you would like us to stop sending you.

Your Right to object to automated decision making and profiling

You have the right to be informed about the existence of any automated decision making and profiling of your personal data, and where appropriate, be provided with meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing that affects you.

Withdraw consent, where consent is the lawful basis for processing

You have the right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Exercising your rights

When you write to us making a request to exercise your rights we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity.

It will help us to process your request if you clearly state which right you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be, the faster and more efficiently we can deal with your request. If you do not provide us with sufficient information then we may delay actioning your request until you have provided us with additional information (and where this is the case we will tell you).

You will not have to pay a fee to access your personal data (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 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.

10. Contact Details

If you have any queries regarding this Privacy Policy, if you wish to exercise any of your rights set out above or if you think that the Privacy Policy has not been followed, please contact us by emailing at info@syntropystates.com.

You may also lodge a complaint to the supervisory authority about the way we process your personal data. We would however, appreciate the chance to address your concerns before you approach the supervisory authority, so please contact us in the first instance.