

Privacy Policy

This privacy policy should be read alongside, and in addition to, our terms of use and cookie policy. Please read this privacy policy carefully since it contains important information about how we may use your Personal Data.

Definitions and interpretation

Under conditions of strict confidentiality, definitions are allowed:

Data Protection Laws: any applicable law relating to the processing of Personal Data and any losses implementing laws, rules and regulations in force in the Lithuanian Protection;

Syndiqate UAB (trading as Syndiqate) (“We”, “Us” and “Our”). We are registered incorporated under the laws and in the jurisdiction of Republic of Lithuania, with the registered legal address Vilnius, Perkūnkiemio g. 13-91, registry code 306029727.

Personal Data, Controller, Processing and Data Subject all have the meanings attributed to them in Data Protection Laws;

You or you: means the user of this website or platform.

Scope of this privacy policy

This privacy policy applies to Personal Data processed by Syndiqate UAB, whether provided by you in person, verbally or in writing.

For purposes of the Data Protection Laws, Syndiqate UAB is the Controller of any Personal Data collected by it. This means that Syndiqate UAB determines the purposes for which, and the manner in which, Personal Data is processed.

We have appointed a data privacy manager who is responsible for overseeing our management of Personal Data and any questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager on office@syndiqate.io.

Personal Data collected

We may collect, use, store and transfer the following categories of Personal Data:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Financial Data includes information such as credit or debit card numbers and expiry dates, and public key addresses.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, a list of URLs starting with a referring site, the site you exit to, and other information about the devices you use to access our products and services.

Usage Data includes information about how you use our products and services.

Marketing Data includes your choices as to whether to receive marketing from us and/or our third parties, and your communication preferences.

We also collect, use, store and transfer 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.

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). We also do not collect any information about criminal convictions and offences.

Our use of Personal Data

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 we need to perform the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your Personal Data although we will get your consent before sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process Personal Data on more than one lawful ground where more than one lawful ground applies, depending on the specific purpose for which we are using your Personal Data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new or prospective customer	(a) Identity (b) Contact	(a) Necessary for the performance of a contract with you (b) Necessary for our legitimate interests
To process and deliver our services to you including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary for the performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Managing our service provision and communicating with you about your request (c) Verifying accurate claims and cover related	(a) Identity (b) Contact (c) Transaction (d) Marketing	(a) Necessary for the performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

administration services (d) responding to any complaints or enquiries which you may raise		
To enable third parties to provide support services to you, for example payment providers	(a) Identity (b) Contact (c) Financial	(a) Necessary for the performance of a contract with you
To troubleshoot and conduct data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you, and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing	Necessary for our legitimate interests (to study how customers use our website, to develop our website and our business, and to inform our marketing strategy)
To improve our products and services, and customer relationships and experiences	(a) Identity (b) Contact (c) Technical (d) Usage	(to define types of customers for our products and services, to develop our products and services and our business, and to inform our marketing strategy)
To administer any competition, prize draw or promotion which you have entered	(a) Identity (b) Contact (c) Marketing	(a) Necessary for the performance of a contract with you (b) Necessary to comply with a legal obligation
To comply with all legal and/or regulatory obligations to which we are subject	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Usage (f) Marketing	(a) Necessary for our legitimate interests (to ensure compliance with applicable laws and regulations) (b) Necessary to comply with a legal obligation

Marketing

We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising.

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

You can ask us or third parties to stop sending you marketing messages by contacting us at any time.

Change of purpose

We will only use your Personal Data for the purposes for which we collected it (which are set out in the table above), 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.

Business Reorganisation

We may share your Personal Data with third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We require our third-party service providers to use your Personal Data for specified purposes and in accordance with our instructions.

Keeping Data secure

We will use technical and organisational measures to safeguard your Personal Data, for example:

1. we store your Personal Data on secure servers and only transfer Personal Data overseas in accordance with applicable laws.
2. payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).
3. we use technical and organisational measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Personal Data, please let us know immediately by contacting us at office@syndiqate.io.

Personal Data retention

Unless a longer retention period is required or permitted by law, we will only hold your Personal Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Personal Data be deleted. Usually that means that we will retain it for up to seven years after your last contact with us.

You have the following rights in relation to your Personal Data:

Right to access – the right to request access to and copies of the Personal Data we hold about you at any time. If we provide you with access to and copies of the Personal Data we hold about you, we will not charge you for this, unless your request is “manifestly unfounded or excessive”. Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

Right to rectification – the right to have your Personal Data rectified if it is inaccurate or incomplete.

Right to erasure – the right to request that we delete or remove your Personal Data from our systems. We will always comply with such request unless we need to retain your Personal Data in order to comply with a legal obligation or in order to establish, exercise or defend legal claims.

Right to restriction of processing – the right to request that we limit our processing of your Personal Data where:

1. you believe that the Personal Data we hold about you is inaccurate and we require reasonable time to verify its accuracy;
2. your Personal Data has been unlawfully processed by us but you do not want us to erase your Personal Data
3. it is no longer necessary for us to keep your Personal Data for the purposes for which it was collected by us, but you require us to retain your Personal Data for the establishment, exercise or defence of legal claims; or
4. you exercise your right to object to processing and we require reasonable time to verify whether there are any overriding grounds upon which we may rely to continue that processing.

Right to data portability - if we process your Personal Data by automated means on the grounds that you have consented to such processing, or if we process your Personal Data by automated means on the grounds that such processing is necessary for the performance of a contract with you, the right to request that we move, copy, or transfer your Personal Data to you or a third party in a structured, commonly used and machine-readable format..

Right to object - if we process your Personal Data on the grounds that such processing is necessary for our legitimate interests, the right to object to our use of your Personal Data. We will always comply with such request unless there are overriding grounds for our continued processing of your Personal Data, such as in order to comply with a legal obligation or in order to establish, exercise, or defend legal claims. To make enquiries, exercise any of your rights set out above, or withdraw any consent upon which we rely as the legal basis to process your Personal Data, please contact us via office@syndiqate.io.

Complaints

If you are not satisfied with the way a complaint you make in relation to your Personal Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. However, we would appreciate the chance to deal with your concerns and welcome you contacting us first.

To ensure that your Personal Data receives an adequate level of protection, we have put in place appropriate safeguards and procedures with the third parties with whom we share your Personal Data. This ensures your Personal Data is treated by those third parties in a way that is consistent with the Data Protection Laws.

Links to other websites

We have no control over third party websites or other parties we may provide a hyperlink to, and we are not responsible for the content of these websites or other platforms. This privacy policy does not extend to your use of such websites or other platforms. You are therefore advised to read the privacy policy of such websites or other platforms prior to using them.

Changes to this privacy policy

Syndiqate UAB reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be posted here and your continued use of our website or platform shall constitute acceptance of any revisions to this privacy policy.