

Privacy Notice

Last updated: 15th July 2025

This notice tells you how we look after your personal data when you visit our website www.syndesi.network (**Syndesi Platform**) or use our services (**Services**).

It sets out what information we collect about you, what we use it for and whom we share it with. It also explains your rights and what to do if you have any concerns about your personal data.

We may sometimes need to update this notice, to reflect any changes to the way the Services are provided or to comply with new legal requirements. We will notify you of any important changes before they take effect.

1. Who we are and other important information

We are Syndesi One Limited, registered in England and Wales with company number 12546771 whose registered address is Treviot House, 186-192 High Road, Ilford, Essex, United Kingdom, IG1 1LR (**we / us / our**).

For all visitors to the Syndesi Platform and customers who purchase our Services, we are the **controller** of your information (which means we decide what information we collect and how it is used). We are registered with the Information Commissioner's Office (**ICO**), the UK regulator for data protection matters, under number ZB228199.




2. Contact details

If you have any questions about this privacy notice or the way that we use information, please get in touch using the following details:

- Email address: hello@syndesi.network
- Postal address: Treviot House, 186-192 High Road, Ilford, Essex, United Kingdom, IG1 1LR

3. The information we collect about you

Personal data means any information which does (or could be used to) identify a living person. We have grouped together the types of personal data that we collect from you below:

Type of Personal Data	
	Identity Data – name, avatar, biography and other profile information you provide, LinkedIn profile URL
	Contact Data – your email address, telephone numbers, office address
	Introductions – information provided to Syndesi or via the Syndesi Platform to Clients, Professionals and/or Accountants in relation to potential introductions to and instructions of Professionals, including uploads and attachments which form part of this information, and quotes provided by Professionals. The actual charges for the work will also be shared by the Professionals to Syndesi, and by Syndesi to the Accountant.



Feedback – information and feedback you provide about our Services, and about Professionals if you are a Client



Communication Data – any exchanges between you and us by email, via the Syndesi Platform or any other means, and any exchanges between you and Clients, Professionals and/or Accountants via the Syndesi Platform, including uploads and attachments which form part of these exchanges, and discussion of quotes by Professionals



Technical and Usage Data – information about your visit to the Syndesi Platform and internet protocol (IP) address, browser type and version, browser plug-in types and versions, operating system and platform on the devices you use to access the Syndesi Platform



Marketing Data – information you submit to confirm whether you wish to receive marketing from us and which method you prefer to be contacted by (e.g. text, email)

4. How we use your information

We are required to identify a legal justification (also known as a **lawful basis**) for collecting and using your personal data. There are six legal justifications which organisations can rely on. The most relevant of these to us are where we use your personal data to:

- fulfil our **contract** with you
- pursue our **legitimate interests** (our justifiable business aims) but only if those interests are not outweighed by your other rights and freedoms (e.g. your right to privacy)
- comply with a **legal obligation** that we have
- do something for which you have given your **consent**

The table below sets out the lawful basis we rely on when we use your personal data. If we intend to use your personal data for a new reason that is not listed in the table, we will update our privacy notice.

Purposes	Justification
Making our Platform available to Users	Contract (you accept our Terms and Conditions)
Facilitating introductions between Accountants and Professionals in relation to Clients, including facilitating communications	Legitimate interests (providing the Syndesi Platform and our Services)
Asking you to provide a feedback about the Syndesi Platform and Services	Consent (the feedback is always optional)

Providing insight on how the Syndesi Platform is being used	Legitimate interest (necessary to improve and optimise the Syndesi Platform)
Administering and protecting the Syndesi Platform and systems	Legitimate interests (necessary to provide our Services, monitor and improve Syndesi Platform security and prevent fraud)
Handling requests for technical support and other queries	Legitimate interests (necessary to provide our Services to you and ensure the proper functioning of the Syndesi Platform)
Defending against legal claims	Legitimate interests (to protect our business and defend ourselves against legal claims)
Notifying you about changes to our privacy notice	Legal obligation (necessary to comply with our obligations under data protection law)

We may **anonymise** the personal data we collect (so it can no longer identify you) and then combine it with other anonymous information so it becomes **aggregated data**. Aggregated data helps us identify trends (e.g. what percentage of users responded to a specific survey). Data protection law does not govern the use of aggregated data and the various rights described below do not apply to it.

5. Who we share your information with

We share (or may share) your personal data with:

- **The Accountant introducing you to Professionals, and the Professionals you contact:** these advisers will have their own privacy obligations as data controllers
- **Our own personnel:** our employees (or other types of workers) who have contracts containing confidentiality and data protection obligations
- **Our supply chain:** other organisations that help us provide our Services. We ensure these organisations only have access to the information required to provide the support we use them and have a contract with them that contains confidentiality and data protection obligations
- **Government agencies and regulators:** as appropriate
- **Our professional advisers:** such as our accountants or legal advisors where we require specialist advice to help us conduct our business
- **Any actual or potential buyer of our business**

If we were asked to provide personal data in response to a court order or legal request (e.g. from the police), we would seek legal advice before disclosing any information and carefully consider the impact on your rights when providing a response. We may not be permitted to notify you that this disclosure occurred.

6. Where your information is located or transferred to

Our servers are in the United Kingdom and EEA, but your personal data may be transferred outside of this territory.

We will only transfer information outside of the UK or European Economic Area (EEA) where we have a valid legal mechanism in place (to make sure that your personal data is guaranteed a level of protection, regardless of where in the world it is located, e.g. by using contracts approved by the European Commission or UK Secretary of State).

If you access the Syndesi Platform or purchase our Services whilst abroad then your personal data may be stored on servers located in the same country as you or your organisation.

The communication methods and suppliers that you use may result in communications to you traversing other geographic areas, for example if your email provider stores their data in the US.

7. How we keep your information safe

We have implemented security measures to prevent your personal data from being accidentally or illegally lost, used or accessed by those who do not have permission. These measures include:

- internal IT and network security
- regular testing and review of our security measures
- staff policies and training
- incident and breach reporting processes
- business continuity and disaster recovery processes
- providing a data processing impact assessment (DPIA) reference document to Professionals and Accountants using the Syndesi Platform

If there is an incident which has affected your personal data and we are the controller, we will notify the regulator and keep you informed (where required under data protection law). Where we act as the processor for the affected personal data, we notify the controller and support them with investigating and responding to the incident.

If you notice any unusual activity on the Syndesi Platform, please contact us at athello@syndesi.network.

8. How long we keep your information

Where we act as the controller, we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for.

To decide how long to keep personal data (also known as its **retention period**), we consider the volume, nature, and sensitivity of the personal data, the potential risk of harm to you if an incident were to happen, whether we require the personal data to achieve the purposes we have identified or whether we can achieve those purposes through other means (e.g. by using aggregated data instead), and any applicable legal requirements (e.g. minimum accounting records for HM Revenue & Customs).

We may keep Identity Data, Contact Data and certain Communications Data for up to six years after the end of our contractual relationship with you.

If you browse the Syndesi Platform, we keep personal data collected through our analytics tools for only for as long as necessary to fulfil the purposes we collected it for.

If you have asked for information from us or you have subscribed to our mailing list, we keep your details until you ask us to stop contacting you.

9. Links to Third Party Websites

The Platform and Services may contain links to third-party websites, applications or services, which permit Users to leave our platform and services and enter non-Syndesi services. Most of such linked websites and services provide legal documents, including terms of use and privacy policy governing the use thereof. It is always advisable to read such documents carefully before using those websites and services, *inter alia*, in order to know what kind of information about you is being collected. We are not responsible for the privacy practices or the content of such resources.

10. Your legal rights

You have specific legal rights in relation to your personal data.

It is usually free for you to exercise your rights and we aim to respond within one month (although we may ask you if we can extend this deadline up to a maximum of two months if your request is particularly complex or we receive multiple requests at once).

We can decide not to take any action in relation to a request where we have been unable to confirm your identity (this is one of our security processes to make sure we keep information safe) or if we feel the request is unfounded or excessive. We may charge a fee where we decide to proceed with a request that we believe is unfounded or excessive. If this happens, we will always inform you in writing.

We do not respond directly to requests which relate to personal data for which we act as the processor. In this situation, we forward your request to the relevant controller and await their instruction before we take any action.

If you wish to make any of the right requests listed below, you can reach us at hello@syndesi.network

Your legal rights



Access: You must be told if your personal data is being used and you can ask for a copy of your personal data as well as information about how we are using it to make sure we are abiding by the law.



Correction: You can ask us to correct your personal data if it is inaccurate or incomplete. We might need to verify the new information before we make any changes.



Deletion: You can ask us to delete or remove your personal data if there is no good reason for us to continuing holding it or if you have asked us to stop using it (see above). If we think there is a good reason to keep the information you have asked us to delete (e.g. to comply with regulatory requirements), we will let you know and explain our decision.



Restriction: You can ask us to restrict how we use your personal data and temporarily limit the way we use it.



Objection: You can object to us using your personal data if you want us to stop using it. If we think there is a good reason for us to keep using the information, we will let you know and explain our decision.



Portability: You can ask us to send you or another organisation an electronic copy of your personal data.



Complaints: If you are unhappy with the way we collect and use your personal data, you can complain to the ICO or another relevant supervisory body, but we hope that we can respond to your concerns before it reaches that stage. Please contact us at hello@syndesi.network.

11. Our cookie policy

The Syndesi Platform uses cookies and/or similar technologies.

Cookies are small text files that are downloaded to your device. Cookies contain a uniquely generated references which are used to distinguish you from other users. They allow information gathered on one webpage to be stored until it is needed for use on another, allowing the Syndesi Platform to provide you with a personalised experience and provide us with statistics about how you interact with the Syndesi Platform.

Cookies are not harmful to your devices (like a virus or malicious code) but some individuals prefer not to share their information (for example, to avoid targeted advertising).

Different types of cookies

Session vs. persistent cookies: cookies have a limited lifespan. Cookies which only last a short time or end when you close your browser are called **session cookies**. Cookies which remain on

your device for longer are called **persistent cookies** (these are the type of cookies allow websites to remember your details when you log back onto them).

First party vs third party cookies: cookies placed on your device by the website owner are called **first party cookies**. When the website owner uses other businesses' technology to help them manage and monitor their website, the cookies added by the other business are called **third party cookies**.

Categories of cookies: cookies can be grouped by what they help the website or website owner do.

- **Necessary cookies** are cookies which help the website to run properly (when they are strictly necessary cookies it means their only function is to help the website work).
- **Performance cookies** help a website owner understand and analyse how website visitors use their website.
- **Analytical cookies** are used to understand how visitors interact with the website. These cookies help provide information on metrics the number of visitors, bounce rate, etc.

What may we use cookies for?

We may use cookies to:

- to track how visitors use the Syndesi Platform
- to record whether you have seen specific messages we display on the Syndesi Platform
- to keep you signed into the Syndesi Platform
- to capture and analyse information such as number of your views and shares

The Syndesi platform does not use cookies at this time. If we change our behaviour in the future then we can only use cookies (besides "necessary" cookies) with your permission. In those cases you will be prompted by a message when you first visit the Syndesi Platform, also known as a cookie banner, where you can choose to accept or decline our cookies

At that time you can choose to decline cookies but if you turn off necessary cookies, some pages and functions on the Syndesi Platform may not work properly.

You will also be able to manage cookies through your browser settings or device settings (your user manual should contain additional information).

You can also delete cookies directly with the relevant third parties (for example, you can disable Google Analytics on their website).

The Syndesi Platform makes use of an alternative user session storage for logged in users. This uses a browser storage technology called Session Storage, which although different to cookies, we feel is appropriate to make clear to you.

The Session Storage tokens that the Syndesi Platform uses are all Necessary items of data to ensure the Syndesi Platform to perform appropriately for logged in users. All Session Storage tokens are cleared by your web browser when you close it, and at that point you are effectively logged out of the Syndesi Platform in that browser.

The tokens we store in Session Storage are:

Token Name	Purpose
syndesi-frontend	Contains your currently logged in user details as displayed and internally used by the Syndesi application running in your browser.
pusherTransportTLS	Maintains detail of your real-time connection to Syndesi servers which facilitates real-time notification to your logged in Syndesi application such as job status changes, new messages, and similar.

