

SYNCLINI™

PRIVACY POLICY & COOKIE POLICY

Company	SynClini Ltd
Registered Number	SC825362
Registered in	Scotland, United Kingdom
Data Controller	Kevin Kennea, Founder
Contact	kevin@synclini.com
Website	synclini.com
Governing Law	UK GDPR & Data Protection Act 2018
Version	1.0
Last Updated	09.03.26

These policies apply to all users of synclini.com and all SynClini services.

PRIVACY POLICY

How SynClini Collects, Uses and Protects Your Personal Data

1. WHO WE ARE

SynClini Ltd ('SynClini', 'we', 'us', 'our') is a private medical concierge and facilitation platform registered in Scotland, United Kingdom (Company Number SC825362). We are the data controller for all personal data collected through this website and our services.

Our nominated data contact is Kevin Kennea, Founder. You can reach us at kevin@synclini.com for any data-related queries, requests, or concerns.

2. WHAT THIS POLICY COVERS

This Privacy Policy explains what personal data we collect from you, why we collect it, how we use it, who we share it with, how long we keep it, and what rights you have over it. It applies to:

- ▶ Visitors to synclini.com
- ▶ Individuals who submit an enquiry or complete our intake form
- ▶ Private clients who engage SynClini's concierge services
- ▶ Clinic professionals who contact SynClini or apply as a partner clinic

3. WHAT PERSONAL DATA WE COLLECT

3.1 Data You Provide Directly

When you submit an enquiry, complete our client intake form, or contact us directly, we may collect:

- ▶ Identity data: first name, surname, date of birth, gender, identity document (for client onboarding)
- ▶ Contact data: email address, phone number, postal address or city
- ▶ Professional data: company name, job title, industry
- ▶ Health and goals data: your stated health goals, areas of interest, preferences, and any medical context you voluntarily share to assist us in matching you with an appropriate clinic
- ▶ Financial context: your stated investment range or budget parameters (we do not collect payment card or banking details)
- ▶ Communication preferences: your preferred mode of contact, privacy intensity level, scheduling preferences
- ▶ Referral data: how you heard about SynClini

3.2 Data We Collect Automatically

When you visit synclini.com, we may automatically collect:

- ▶ Technical data: IP address, browser type and version, operating system, device type
- ▶ Usage data: pages visited, time spent on pages, referring website, links clicked
- ▶ Cookie data: see our Cookie Policy below for full details

3.3 Data We Do Not Collect

SynClini does not collect full medical records, clinical diagnoses, or prescription information. We do not process payment card data. We do not collect biometric data. Any health information you share with us is limited to high-level goals and preferences voluntarily provided to assist with clinic matching — not clinical assessment.

4. LEGAL BASIS FOR PROCESSING

Under the UK General Data Protection Regulation (UK GDPR), we must have a lawful basis for processing your personal data. We rely on the following:

Consent	Where you have actively provided your data and agreed to us processing it — for example by submitting our intake form or ticking a consent confirmation. You can withdraw consent at any time.
Legitimate Interests	Where processing is necessary for our legitimate business interests and does not override your rights — for example, maintaining records of enquiries, improving our services, and managing our network.
Contract Performance	Where processing is necessary to fulfil a service agreement — for example, coordinating your introduction to a clinic partner once you have engaged our concierge service.
Legal Obligation	Where we are required to process or retain data to comply with applicable law.

5. HOW WE USE YOUR PERSONAL DATA

Purpose	Lawful Basis
To respond to your enquiry and communicate with you	Consent / Legitimate Interests
To assess suitability and match you with appropriate clinic partners	Consent / Contract Performance
To share a client brief with your chosen clinic (with your explicit consent)	Consent
To coordinate appointments, scheduling, and logistics	Contract Performance
To manage ongoing client relationships and pathway planning	Contract Performance / Legitimate Interests
To maintain records of clinic partnerships and referral activity	Legitimate Interests / Legal Obligation
To improve our services, processes, and platform	Legitimate Interests
To comply with legal and regulatory obligations	Legal Obligation
To send you relevant updates about SynClini services (only where you have opted in)	Consent

WHAT WE NEVER DO WITH YOUR DATA

We never sell your personal data to any third party.

We never share your data with advertisers or marketing platforms.

We never use your data for automated decision-making that has a legal or similarly significant effect on you.

We never share your data with a clinic without your explicit prior consent.

We never use your health information for any purpose other than facilitating your care coordination.

6. WHO WE SHARE YOUR DATA WITH

6.1 Clinic Partners

We share a limited client brief with your chosen clinic partner only when you have given explicit consent for us to do so. The brief contains only the information necessary for treatment coordination — your name, contact details, goals, budget range, and any medical context you have chosen to share. We do not share your full personal record.

6.2 Service Providers

We use a small number of trusted third-party service providers to operate our business. These may include: Google (Google Workspace — email and document storage), Airtable (CRM and operational database), and website hosting providers. All providers are bound by data processing agreements and are prohibited from using your data for any purpose other than providing services to SynClini.

6.3 Legal Requirements

We may disclose your personal data if required to do so by law, court order, or regulatory authority, or where we believe disclosure is necessary to protect the rights, property, or safety of SynClini, our clients, or others.

6.4 Business Transfers

In the event of a merger, acquisition, or sale of SynClini's business or assets, your personal data may be transferred to the acquiring entity. You will be notified of any such transfer and any material changes to how your data is handled.

7. INTERNATIONAL DATA TRANSFERS

SynClini is based in Scotland, UK. If we transfer your personal data outside the UK or European Economic Area, we will ensure appropriate safeguards are in place — such as standard contractual clauses approved by the UK Information Commissioner's Office (ICO) — to protect your data to the same standard as required under UK GDPR.

8. DATA RETENTION

Enquiries and intake forms (no service engaged)	12 months from last contact, then securely deleted
Active client records	Duration of relationship plus 3 years following last interaction
Client health and goals information	Duration of relationship plus 3 years, or until deletion requested
Clinic partner records	Duration of partnership plus 6 years (legal and financial obligation)
Financial and invoicing records	7 years (HMRC legal requirement)
Website analytics and cookie data	As specified in the Cookie Policy below

On expiry of the applicable retention period, data is securely and permanently deleted. You may request earlier deletion of your data at any time — see Section 10.

9. DATA SECURITY

SynClini takes the security of your personal data seriously. We implement appropriate technical and organisational measures to protect your data against unauthorised access, accidental loss, destruction, or disclosure. These measures include:

- ▶ Encrypted email and document storage through Google Workspace
- ▶ Access controls limiting data access to authorised personnel only
- ▶ Secure, password-protected systems with two-factor authentication
- ▶ No storage of sensitive health data in unencrypted formats

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the ICO within 72 hours and inform you directly without undue delay where required.

10. YOUR RIGHTS UNDER UK GDPR

You have the following rights in relation to your personal data held by SynClini. To exercise any of these rights, contact us at kevin@synclini.com. We will respond within 30 days.

Right of Access	Request a copy of all personal data we hold about you (Subject Access Request).
Right to Rectification	Request correction of any inaccurate or incomplete personal data.
Right to Erasure	Request deletion of your personal data where there is no compelling reason for us to continue processing it ('right to be forgotten').
Right to Restriction	Request that we restrict processing of your data in certain circumstances.
Right to Portability	Request transfer of your data to you or a third party in a structured, machine-readable format.
Right to Object	Object to processing based on legitimate interests or for direct marketing purposes.
Right to Withdraw Consent	Where processing is based on consent, withdraw that consent at any time without affecting the lawfulness of prior processing.
Right to Complain	Lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk or by calling 0303 123 1113.

11. CHILDREN'S DATA

SynClini's services are intended for adults aged 18 and over. We do not knowingly collect personal data from anyone under the age of 18. If you believe a minor has submitted data to us, please contact us immediately at kevin@synclini.com and we will delete it promptly.

12. THIRD-PARTY LINKS

Our website may contain links to third-party websites or services. This Privacy Policy applies only to SynClini and synclini.com. We are not responsible for the privacy practices of any linked third-party sites. We encourage you to read the privacy policy of any site you visit.

13. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. Material changes will be communicated to active clients by email. The current version of the policy is always available at synclini.com. The version date at the top of this document indicates when it was last updated.

14. CONTACT US

For any questions, concerns, or requests relating to this Privacy Policy or your personal data, please contact:

Name	Kevin Kennea
Role	Founder & Data Controller — SynClini Ltd
Email	kevin@synclini.com
Website	synclini.com
Registered Address	37 Shillingworth Place, Bridge of Weir, Scotland, PA11 3DY

COOKIE POLICY

How SynClini Uses Cookies and Similar Technologies on synclini.com

1. WHAT ARE COOKIES

Cookies are small text files placed on your device when you visit a website. They are widely used to make websites function correctly, work more efficiently, and provide information to the website owner. Cookies do not give us access to your device and cannot carry viruses or install malware.

Similar technologies include web beacons, pixels, and local storage — these function in comparable ways and are covered by this policy.

2. HOW WE USE COOKIES

SynClini uses cookies to:

- ▶ Ensure the website functions correctly and securely
- ▶ Remember your preferences and settings during your visit
- ▶ Understand how visitors use our website so we can improve it
- ▶ Measure the effectiveness of our content

We do not use cookies to serve advertising, track you across third-party websites, or build advertising profiles.

3. TYPES OF COOKIES WE USE

Cookie Type	Purpose & Details
Strictly Necessary	Essential for the website to function. These cookies enable core functionality such as page navigation, form submission, and security. They cannot be disabled. No personal data is collected beyond what is technically necessary for operation.
Performance & Analytics	Help us understand how visitors interact with the website — which pages are visited most, how long visitors stay, and where they came from. We use this to improve the site. Data collected is aggregated and anonymous. Examples: Google Analytics or equivalent. These cookies are only set with your consent.
Functionality	Remember choices you make to improve your experience — such as language preferences or whether you have dismissed a notification. These do not track activity across other websites. Set with your consent.
[Marketing / Targeting]	SynClini does not currently use marketing or targeting cookies. If this changes, this policy will be updated and fresh consent obtained before any such cookies are placed.

4. COOKIE CONSENT

When you first visit synclini.com, you will be presented with a cookie consent banner. Strictly necessary cookies are placed automatically as they are essential for the site to function. All other cookie categories require your explicit consent before being placed on your device.

You can change your cookie preferences at any time by clicking the 'Cookie Settings' link in the footer of our website, or by clearing your cookies and revisiting the site.

5. SPECIFIC COOKIES USED

Cookie Name	Provider
[To be populated once site platform is confirmed]	SynClini / Third Party
_ga	Google Analytics
ga[ID]	Google Analytics
cookieconsent_status	SynClini

6. THIRD-PARTY COOKIES

Some cookies on our website are placed by third-party services we use. We do not control these cookies directly. Current third-party providers whose cookies may be present on synclini.com include:

- ▶ Google Analytics — website usage analytics. Google's privacy policy: policies.google.com/privacy
- ▶ [Add any additional third-party services used — e.g. Hotjar, HubSpot, LinkedIn Insight Tag, Meta Pixel — once site is fully built]

We only permit third-party cookies where those providers offer adequate data protection standards and appropriate contractual safeguards.

7. HOW TO CONTROL AND DELETE COOKIES

Browser Settings

You can control and delete cookies through your browser settings. Most browsers allow you to: block all cookies, block only third-party cookies, clear cookies when you close the browser, or manage cookies on a site-by-site basis. Note that blocking all cookies may affect the functionality of this and other websites.

Browser-specific instructions:

- ▶ Google Chrome: Settings → Privacy and Security → Cookies and other site data
- ▶ Safari: Preferences → Privacy → Manage Website Data
- ▶ Firefox: Options → Privacy & Security → Cookies and Site Data
- ▶ Microsoft Edge: Settings → Cookies and site permissions

Opt Out of Analytics

To opt out of Google Analytics tracking across all websites, install the Google Analytics Opt-out Browser Add-on available at tools.google.com/dlpage/gaoptout.

8. DO NOT TRACK

Some browsers include a 'Do Not Track' (DNT) feature that sends a signal to websites requesting that your browsing is not tracked. There is currently no universal standard for how websites should respond to DNT signals. SynClini does not currently respond to DNT signals, but we do not engage in cross-site tracking regardless.

9. CHANGES TO THIS POLICY

We may update this Cookie Policy as our use of cookies changes or as legal requirements evolve. Any material changes will be notified via the cookie consent banner on your next visit to synclini.com. The current version is always available at synclini.com. The version date at the top of this document indicates when it was last reviewed.

10. CONTACT

For any questions about our use of cookies or this policy, please contact Kevin Kennea at kevin@synclini.com.
