

CYNDICATE

Privacy Policy

This Policy was updated on April 29th, 2024.

CYNDICATE (collectively referred to as “we” or “us”) has developed this Privacy Policy that governs the collection, use, disclosure, transfer, storage, and protection of your personal information shared with us. By using Cyndicate.io website (Website) and any services available within the Website (collectively the “Service”), you agree that you have read, understood, and accept this Privacy Policy.

You may be asked to provide your personal information anytime you are in contact with us. Your information may be used in conjunction with other information to provide and improve our Service, content, and advertising.

PLEASE READ THIS PRIVACY POLICY CAREFULLY AS IT DESCRIBES YOUR RIGHTS, RESPONSIBILITIES, AND LIABILITIES. BY ACCESSING OR USING THE SERVICES OR OTHERWISE PROVIDING US WITH PERSONAL INFORMATION, YOU ARE CONSENTING TO THE TERMS OF THIS PRIVACY POLICY AND OUR [TERMS & CONDITIONS](#).

1. Sources of Information.

We collect the personal information identified herein directly from you when you use our Service, through automated means when you are using the Site, and from third parties, as follows:

1.1 First Party / Direct Collection. We collect personal information directly from you when you use our Service (e.g., registering accounts, completing purchases, signing up for subscriptions) or whenever you directly engage with us, such as when you visit our offices or premises or otherwise contact us.

1.2 Automated Collection. As described below, we may collect information and data, such as usage data and cookies, through automated means when you use the Site (see “Technical Data” above).

1.3 Third-Party Sources. We collect personal information from third parties, such as publicly available databases, social networking providers, advertising companies, our Service providers, and third-party references.

2. Types of Personal Information.

We collect personal information in order to provide our Service, comply with our legal obligations, promote our business interests, and for the other reasons set forth in this Privacy Policy. When you do not provide personal information to us, we may not be able to provide you the Services or to complete a transaction you requested. Generally, we collect the following types and categories of personal information during our business operations:

1.1

Personal Information	
Category	Description/Examples
Personal Identifiers	Identifiers, such as your name, alias, address, email address, account name, and telephone number.
Registration Data	Information provided when you register for an account to use the Site, including usernames and passwords.

Online Identifiers (For more information, see “Technical Data Collection” below)	Persistent identifiers that can be used to recognize you or your device over time and across different services, including a device identifier, an Internet Protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifiers, and similar technology.
Commercial Information	Records of your purchases or other consuming histories or tendencies with respect to our Services.
Business Contact Data	Information related to employees, owners, directors, officers, or contractors of a third-party organization (e.g., business, company, partnership, sole proprietorship, nonprofit, or government agency) with whom we conduct, or possibly conduct, business activities.
Health and Disability Data	You may furnish us with health-related information in the event we undertake health screening, or accommodate a disability when you engage with us.
Marketing and Communications Data	Information with respect to your marketing preferences and your subscriptions to our publications and alerts.
Internet and Electronic Network Data	Data pertaining to your access or use of the Service, including browsing history, search history, and information regarding your interaction with the Site or advertisements embedded on the Site or other third-party websites, and information derived from any device that connects to our WiFi services.
Visitor Information	Information an individual provides when visiting any of our physical location or premises (e.g., visitor logs and registries, vehicle and parking information, security camera recordings).
Geolocation Data	Information about the general city, state, or region in which a user of the Site is located.
Inferences	Inferences drawn from some of the personal information categories identified herein and used to create a consumer profile reflecting your purchasing and marketing preferences, characteristics, and behavior.

3 How we use your information.

We collect your personal information to improve our Service and enhance our business operations. Additionally, we utilize this information for security purposes, analytics, and research to ensure the best user experience. Here is a breakdown of how we use your information:

- 3.1 To provide and improve our Service. Developing, delivering, and enhancing our Service; protecting against fraud, ensuring security, and resolving technical issues; improving the safety and security of our website; offering customer support and addressing your inquiries.
- 3.2 To market our Service. Displaying advertisements about the Company and the Service we offer; analyzing the usage of our website and Service.
- 3.3 To correspond with you. Responding to any communication we receive from you; contacting you when necessary or requested; sending you relative information about our Service.
- 3.4 To comply with legal requirements. Abiding by applicable laws, regulations, requests, and legal processes; protecting the rights, property, or safety of you, Service, or another party; enforcing the Terms and Conditions that govern our Service; resolving any disputes that may arise.

4 How we may share your information.

We may share your personal information with:

- 4.1 Advertising Partners. We engage certain advertising partners (ad networks) assisting us in delivering advertising to you and allowing us to provide you with Website and Service and in these cases, we may share your personal data just for the purposes of information provision to you. In such a case, we may allow advertising partners to track impressions, clicks, or other advertising indicators via tracking providers for the sake of measuring advertising performance or etc. For information on how to exercise your rights related to advertising, please see “Your Rights” below.
- 4.2 Analytics Providers. We may also acquire the Service of analytics providers in order to provide Service for analysis and research purposes. The device data we share with these providers will be encrypted. We could also collect data for benchmarking or otherwise.
- 4.3 Service Providers. We engage partners and/or Service providers in connection with the delivery of our Service.
- 4.4 Legal Rights for Disclosure. In any case, we reserve the right for disclosure of your personal information and data (including personally identifiable data) in accordance with law, legal processes, litigation, and/or requests from public and state authority within or beyond your country of residence. We may also disclose your information if we decide that such disclosure is necessary or appropriate for national security, law enforcement, or other purposes of importance for the public, we may also disclose your information if we decide that such disclosure is reasonable to ensure our Website’s operation and provision of Service.
- 4.5 Transferring Information to Third Parties. In the event of a reorganization, mergers, acquisitions, transferring data to the affiliated parties and in other cases we may transfer any or all information (including personally identifiable information) we collect to the relevant third party. For any additional questions and issues regarding information collection and usage, please email us at contact@cyndicate.io.

5 Technical Data Collection and Opt-Out:

- 5.1 Cookies and Tracking Data. Our Service uses cookies and similar technologies, such as pixel tags, web beacons, clear GIFs, and JavaScript (collectively referred to as “Cookies”). Cookies are text files that websites store on a visitor’s device to uniquely identify their browser, remember preferences, and enhance navigation and functionality. We use cookies on our Website and Service to gather information that helps us understand user activity and patterns.

You have the option to accept or decline Cookies by adjusting your internet browser settings. Most browsers allow you to disable the Cookie feature, preventing your browser from accepting new Cookies. Depending on your browser’s capabilities, you may also be able to choose whether to accept each new Cookie. Deleting existing Cookies is also possible, but please note that this may require you to manually adjust preferences on subsequent visits and may affect Services and functionalities.

- 5.2 Usage and Device Data. When you access and use the Service, we automatically collect details of your access to and use of the Website, including traffic data, usage logs and other communication data, and the resources that you access and use on or through the Site (e.g., browsing history, search history). We may also collect

information about your device and internet connection, including the device's unique identifier (e.g., device type, IMEI, Wi-Fi MAC, IP address), operating system, browser type, and mobile network information. The Website may collect "diagnostic" data related to your use of the Service, such as crash data and logs, performance data (e.g., launch time, hang rate, or energy use), and any other data collected for the purposes of measuring technical diagnostics.

5.3 Site Monitoring. Please be aware that we, and our service providers and partners, use cookies and other tracking technologies within the Site to monitor and record any and all activities and communications to, from, and on, the Site in order to safeguard, improve, and analyze usage of, the Site, for marketing, and for the other purposes listed in this Privacy Policy. For the avoidance of doubt, you hereby acknowledge, agree, and consent to, such monitoring and recording by us and our service providers and partners.

5.4 Non-Cookie Technologies. Our Site may deploy "Non-Cookie Technologies" to support our digital advertising programs. These technologies often include browser cache, locally stored objects, or the creation of a statistical identifier wherein an identifier, much like a cookie identifier, is calculated based on the characteristics of a browser or device that distinguishes it from other browsers or devices. These identifiers are calculated either from the data your browser or device shares automatically with the Site or with additional data specifically requested from your browser or device. For more information, see https://thenai.org/wp-content/uploads/2021/07/NAI_BeyondCookies_NL.pdf.

6 Social Media/ Platform Data Rights

We may engage with you on various social media platforms (e.g., Facebook, Twitter, Pinterest, Instagram). If you contact us on a social media platform for customer support or for other reasons, we may contact you via the social media's direct message tools. Those communications to and from us are governed by this Privacy Policy. However, your use of a social media platform is also subject to the policies and terms of the relevant social media platform. Certain social media platforms may also automatically provide us with your personal information, the information we receive will depend on the terms that govern your use of the social media platform(s) and any privacy settings you may have set. The Site includes social media features and widgets (e.g., the "Facebook Like" button, the "Share This" button) or interactive mini-programs that run on the Site. These features may collect your IP address and which Site page you are accessing and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Site. Your interactions with these features are governed by the privacy statement of the relevant social media platform that provides them.

According to the terms and conditions governing certain social media platforms, you may request that the information, data, or other content we obtain from or through the social media platform ("**Platform Data**") be deleted or modified. If you would like Platform Data related to you deleted or modified, please contact us in accordance with the "Contact Us" section below and (i) identify the social media platform at issue and (ii) the Platform Data that you would like deleted and/or modified, and if modified, the modification to said Platform Data. We may also delete Platform Data if requested by the social media platform.

7 Children's privacy.

Our Website does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from children under 18. If you are a parent or guardian and you are aware that your Children have provided us with Personal Information, please contact us regarding this matter. If we become aware that we have collected Personal Information from a child under the age of we will take steps to remove that information from our servers.

8 Consent to transfer to other countries and processing of personal information.

We are based in the United States and the personal information that we collect and process is retained and stored in the United States. We may use services providers that store personal information on our behalf in other countries. By accessing the Website and using Service and providing personal information through them, you

agree and consent that we may collect, process, and transfer such information in the country of our locale, your locale and other countries. Other countries may have different privacy laws and provide different levels of protection of personal information.

9 Your Responsibilities.

You are permitted, and hereby agree, to only provide personal information to us if such personal information is accurate, reliable, and relevant to our relationship and only to the extent such disclosure will not violate any applicable data protection law, statute, or regulation or infringe upon a person's data privacy rights or privileges.

IF YOU PROVIDE PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) TO US, YOU EXPRESSLY REPRESENT AND WARRANT TO US THAT YOU HAVE THE FULL RIGHT AND AUTHORITY TO PROVIDE US WITH SUCH PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) AND THAT OUR USE AND PROCESSING OF SUCH PERSONAL INFORMATION AS SET FORTH HEREIN WILL NOT VIOLATE ANY PERSON'S RIGHTS OR PRIVILEGES, INCLUDING RIGHTS TO PRIVACY. YOU HEREBY AGREE TO FULLY AND COMPLETELY INDEMNIFY US FOR ANY CLAIMS, HARM, OR DAMAGES THAT MAY ARISE FROM YOUR PROVISION OF PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) TO US.

10 Your Privacy Rights.

Depending on applicable law, you may have certain rights in connection with your personal information and how we handle it in accordance with General Data Protection Regulation ("GDPR"), California Consumer Protection Act ("CCPA"), and other similar state laws. Some of these rights may be subject to some exceptions or limitations. You can exercise these rights at any time by following the instructions below or sending us relevant requests to contact@cyndicate.io.

- 10.1 Right to withdraw your consent (e.g. you may withdraw your consent to show personalized ads to you).
- 10.2 Right to access your data (e.g. you may check what data we store about you).
- 10.3 Right to correct your data (e.g. you can contact us if your email address or other information has been changed and we should replace it).
- 10.4 Right to have your data deleted (e.g. you can contact us if you want us to delete certain data we have stored about you);
- 10.5 Right to restrict processing of your personal information.
- 10.6 Right to take your data with you to obtain your personal data and receive it in a structured, commonly used and machine-readable format data if you want to upload it to another Service.
- 10.7 Right to object how your data is handled, if you do not agree with any user analytics procedures as described in this Privacy policy.
- 10.8 Right to object to having use your personal information to conduct automated decision making. (however, we do not engage in any activity that subjects our customers, website users, or others to a decision based solely on automated processing, including profiling, which produces legal effects, or similarly significant results, impacting them.)
- 10.9 Right to withdraw your consent at any time if we are solely relying on your consent for the processing of your personal information.
- 10.10 Right to opt out of marketing communications at any time by following the instructions provided at the bottom of our marketing emails. However, please note that even if you opt out of marketing communications, you may still receive Service-related and non-marketing emails.
- 10.11 Do Not Share/Targeted Advertising Rights. You may have the right to opt out from having us disclose your personal information to third parties for targeted advertising purposes. This is sometimes referred to as the right to opt-out of the "sharing" of personal information for cross-contextual behavioral advertising purposes. To prevent your personal information from being used in these circumstances, please click on the cookie

management tool (sometimes visible as a “Your Privacy Choices” link) on the footer of the site to set your cookie preferences.

- 10.12 Do Not Sell My Personal Information. You may have the right to opt out from having us sell your personal information to third parties for profit or for monetary or other valuable consideration. To prevent us from selling your personal information, please follow the instructions set forth in the “Do Not Sell My Personal Information” link on the footer of our site.

We will facilitate your exercise of the rights that apply to you in accordance with applicable law. However, even if your personal information is not afforded protection under, or otherwise subject to, a data protection law, we may seek to accommodate any request or inquiry you may have with regard to our data processing activities. If you have questions about your rights or wish to exercise your rights, you can contact us at contact@cyndicate.io.

11 Privacy Appeals; Complaints.

In certain jurisdictions, you may have the right to appeal a decision we have made with respect to your privacy request. To submit a privacy rights decision appeal, please email us at contact@cyndicate.io with the subject line “ATTN: Privacy Appeals,” and describe the nature of your request, and the reason for requesting an appellate review.

Depending on applicable law, you may have the right to submit a complaint to a data protection authority responsible for overseeing our compliance with data protection law in your jurisdiction. Please see a list of potentially applicable regulatory authorities:

- 11.1 For data protection authorities in the EU, please see here: https://edpb.europa.eu/about-edpb/about-edpb/members_en.
- 11.2 For the data protection authority in Switzerland, please contact the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home.html>).
- 11.3 For the data protection authority in the UK, please contact the Information Commissioner’s Office (www.ico.org.uk).
- 11.4 If you are a resident of Colorado, you may file privacy complaints with the Colorado Attorney General at: <https://coag.gov/file-complaint/>.
- 11.5 If you are a resident of Connecticut, you may file privacy complaints with the Connecticut Attorney General at: <https://portal.ct.gov/DPC/Complaint-Center/Consumers—Complaint-Center>).
- 11.6 If you are a resident of Virginia, you may file privacy complaints with the Virginia Attorney General at <https://www.oag.state.va.us/contact-us/contact-info>.

We would, however, appreciate the opportunity to address your concerns, so please feel free to contact us regarding any complaint you may have. We will not discriminate against individuals for exercising their data privacy rights or filing a privacy complaint.

12 Legal Basis for Processing (EEA/UK/Switzerland Only).

For purposes of the EU/UK GDPR, we can collect and process your data under one of the following legal bases:

- 12.1 Consent. We can collect and process your data with your consent. For example, if you have given your consent to receiving marketing material from us at the point we collected your information.
- 12.2 Contractual Obligations. We need your personal information to comply with our contractual obligations. For example, if you have subscribed to one of our services, we use your personal information to fulfill, and deliver that service to you.
- 12.3 Legal Compliance. If the law requires us to, we may need to collect and process your data.
- 12.4 Legitimate interest. We may use your data as required in the normal course of operating our businesses and services unless our legitimate interests are overridden by your rights.

12.5 Vital interests. We may need to process your personal information if the processing is necessary to protect your vital interests (for example, health and safety reasons if you attend a meeting at our offices).

13 Do-Not-Track Signals.

Some web browsers may transmit “do-not-track” signals to the website with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they are even aware of them. Unless otherwise required by law, we currently do not take action in response to these signals.

14 Retention of your personal data.

The privacy and security of your personal data is important to us and we always pay special attention to ensure that we process your information lawfully in accordance with GDPR for EEA users, CCPA for California consumers and other legislation. We store your information for as long as needed to provide you with our Service and Website operation. We may store the information longer, but only in a way that so it cannot be tracked back to you. We operate globally and we share your information with our partners just for the purposes stipulated herein, which may include a transfer of your personal information to any countries outside of your or our locale. Please check regularly for changes to our Privacy Policy.

15 Security.

We may implement appropriate technical and organizational measures to protect the confidentiality, security, and integrity of the collected information, and to prevent unauthorized access and the use of information contrary to this Privacy Policy. Although we use commercially reasonable efforts to assure that your information remains secure when maintained by us, please be aware that no security measure is perfect or impenetrable. We disclaim all warranties and representations in connection with the security measures taken to protect your personal information.

16 Changes to our Privacy Policy.

We will occasionally update this Privacy Policy as necessary to protect our users, furnish refined current information, and respond to legal and technical changes. The most current version of the Privacy Policy will govern our use of your information and will be available on our Website.

17 Persons with Disabilities. We strive to ensure that every person has access to information related to our Services, including this Privacy Policy. Please contact us if you would like this Privacy Policy provided in an alternative format, and we will seek to meet your needs.

18 Contact Us. If you have any questions about this Privacy Policy, please contact us via email:

contact@cyndicate.io.