

APP PRIVACY NOTICE

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Syncera UK Ltd · registered in England and Wales, company number 17170367 · registered office 2 High Street, Poole, England, BH15 1BW

Privacy notice for the Syncera app.

This notice explains how Syncera UK Ltd ("Syncera", "we", "us") uses your personal data when you have an account in the Syncera app at app.syncerauk.com. It is published at syncerauk.com/legal/app-privacy. Our website privacy notice at syncerauk.com/legal/privacy does not cover your app account.

Two public pages it links to (who receives data, and how long we keep it) and the app's Help pages give more detail.

1. Who we are.

Syncera UK Ltd, a company registered in England and Wales (company number 17170367, registered office 2 High Street, Poole, England, BH15 1BW), is the controller of your personal data. We are registered with the Information Commissioner's Office under reference ZC141252.

To use your data rights (clause 9), email privacy@syncerauk.com. You can also write to Syncera UK Ltd, 20 Wenlock Road, London N1 7GU.

2. What we keep, why, and our lawful basis.

Where we rely on our legitimate interests, the table says what the interest is, and you can object (clause 9).

Purpose	What we keep	Lawful basis
Your account and signing in	Your email address; if you sign in with another account provider, your name, identifier and profile picture link from it; if you sign in at our stand, the email address on your stand order	Contract (our Terms of Service)
Your details and your order	Your name and mobile number, if you add them, and any order email you add and confirm. They are not used for marketing.	Contract
One record of each customer	We link your account to any customer record we already hold for your email address, or create one	Legitimate interest in keeping one accurate record of each customer and matching you to your order
Your plan and bills	Your plan, numbers, SIM, number moves, roaming, renewal, contract end, account notices, bills and payments	Contract
Protecting your number	A record each time you show your number	Legitimate interest in protecting your number if someone else gets into your account
Messages, cancellations and complaints	What you write, our replies, and the request or order it is about, including requests our team opens for you	Contract if you have a plan; otherwise legitimate interest in answering you; for complaints about your mobile service, also legal obligation

Purpose	What we keep	Lawful basis
Extra care	A note that you need extra care, if you tell us about your health, a disability or something similar and agree to us noting it	Explicit consent: withdraw it at any time
Marketing	The words you agreed to, and when	Consent: withdraw it at any time (clause 9)
Notifications	Your browser's push address, to tell you our team has replied. They never carry offers.	Consent: turn them off at any time
How you use the app	A few usage events, kept in our systems, never anything you typed. The "How you use the app" switch in Profile is on unless you turn it off	Legitimate interest in improving the app
A friend's link	Your friend's referral code, so we can count it for them. They never see your name or email.	Legitimate interest in running our referral scheme
Blocks, test accounts and staff actions	A block and its reason, test marks, tester confirmations, and a log of what our staff did on your account	Contract (blocks, tester confirmation); legitimate interest in security and accountability
Running and securing the app	Technical logs (such as IP address, approximate location, device and pages requested) and sign-in events	Legitimate interest in a secure, working app
Records kept after you leave	Proof of what you agreed to and asked for, and your order records	Legitimate interest in showing what you agreed and defending claims; legal obligation (order records)

What you must give us. An email address, to have an account. Everything else is optional. You must be 18 or over.

3. AI.

AI may help us read and answer what you write to us, in the app or by email (except at privacy@syncerauk.com), including an AI assistant that replies to you and tells you it is AI. It never makes a decision about you with legal or similarly significant effects, such as on a cancellation, a complaint or a refund: a person does, and you can always ask for a person. We remove email addresses, phone numbers, PACs and STACs before a message goes to it, and, when possible, we choose AI providers whose terms do not let them train on our data. We rely on our legitimate interest in answering you quickly and well. You can object: email privacy@syncerauk.com and we keep your messages away from AI. A request to use your rights is handled only by people.

If what you want to tell us is sensitive, such as your health, send it to privacy@syncerauk.com: only people read it.

No decision with legal or similarly significant effects on you is made solely by automated means.

4. On your device.

The app sets **no cookies**. It keeps in your browser's storage what it needs to work (your sign-in and small notes, such as where to return after signing in) and, unless you turn off "How you use the app", a note that you opened the app today and, until your account opens, the sign-in screens you used, for usage statistics. The usage records themselves are kept in our systems, not on your device. Nothing here tracks you across other websites. Signing out or deleting your account clears these notes, except a deletion or a request to stop

marketing that has not reached us yet, which is cleared once it does. The app's Help page lists them.

5. Where we get your data.

From you; from the account provider you sign in with, if you choose to; from your stand order; from a friend's link; from our team; from any customer record we already hold under your email address; and from our records of your order and those of the mobile network supplier we buy from. We send nothing about your app account to that supplier.

6. Who receives it.

We share your data only for the purposes in clause 2 or where the law requires. We do not sell it or share it for advertising. The recipients are:

- **our service providers**, in these categories: hosting; database and file storage; backups; email; error reports; AI assistance; and software development and support;
- **others we share data with:**
 - **the account provider you sign in with**, if you choose to, under its own privacy policy;
 - **your browser's push service**, which delivers notifications and sees only your browser's push address.

Each service provider works under data processing terms that let it use your data only on our instructions. What each category does and where, and the others we share data with, are at syncerauk.com/legal/processors. Ask privacy@syncerauk.com for the names.

7. Transfers and retention.

Transfers. Our databases and the app's servers are in London. Some providers process data in the EU or the United States, under the UK's adequacy regulations, the UK-US data bridge or the UK addendum to the EU standard contractual clauses. Ask us for details.

How long we keep it. We keep your app account until you delete it, or delete it after 2 years unused if you have no live Syncera Mobile plan. Otherwise we keep your data for no longer than:

- **6 years after our last dealing with you, the end of your contract or the close of your request, whichever is latest**, for our customer record and your email addresses, your order records, your messages, cancellations and complaints (kept whole until then), copies in our mailboxes, the records of what you agreed and chose, the times you showed your number, referrals, blocks and the staff log, and the record that AI was used;
- **24 months** for usage records, after which only totals with nothing about you are kept. Turning off "How you use the app" deletes them at once, except the record of when you joined; deleting your account deletes them all;
- **90 days** for technical logs, error reports, email delivery records, drafted AI text, and a push address that keeps failing;
- **30 days** for a sign-in that never became an account.

Backup copies of our systems are kept for up to **2 years** (if we restore one, we re-apply deletions before using it). We also keep a monthly encrypted copy of our files, used only to recover from a failure, and delete older copies on a rolling basis. After you delete your account we keep your email address, for the 6 years above, so we never contact you again by mistake. We keep a record longer only while a claim, dispute or investigation needs it. The exact period for each record is at syncerauk.com/legal/retention.

8. Deleting your account.

Use **Delete my account** in Profile. It cannot be undone. It deletes your sign-in, account, details, push addresses and usage records, and stops your marketing. We keep the other records in clause 7 for their periods, including the record of what you agreed and chose. Deleting your account does not end a Syncera Mobile plan or withdraw a request: we still write to you about it, and as your mobile terms and the law require. The app's Help page lists what goes and what stays.

9. Your rights.

You can ask for a copy of your data, and ask us to correct it, erase it, limit its use, or send what you gave us to you or someone else. Some of these have limits in law: if you ask us to erase, we keep what the law or a possible legal claim needs, and your messages, cancellations and complaints are kept whole until their period ends. Where we rely on consent, you can withdraw it at any time; this does not affect what we did before. **You can object** to any use that relies on our legitimate interests; we will stop unless we have compelling grounds or need it for a legal claim. To object to usage records, turn off "How you use the app" in Profile, or email privacy@syncerauk.com.

Email privacy@syncerauk.com, write to us, or tell us in the app. It's free. We answer within one month, or within three months for a complex request, and if so we tell you why within the first month. If we need to check who you are, the month starts once we can.

Stop marketing with the link in any marketing email, in Profile, in the app, at hello@syncerauk.com, or by deleting your account. **Stop notifications** in your phone's or browser's settings.

Complaints. If you are unhappy with how we handle your data, complain to us first at hello@syncerauk.com (or privacy@syncerauk.com about a request to use your rights). We acknowledge your complaint within 30 days and tell you the outcome without undue delay. You can then complain to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113.

10. Changes to this notice.

We issue a new version, and tell you in the app or by email at least 14 days before it takes effect, when we add a purpose, a lawful basis, a kind of recipient, a transfer outside the UK or an automated decision, or keep anything longer. Other updates to the linked pages and the app's Help pages do not need a new version. Each version's effective date, and earlier versions, are at syncerauk.com/legal/app-privacy.