



Privacy Notice

Synapto Ltd
Date: December 2024
Version: v1.0

Welcome to the Synapto Ltd's privacy notice.

This privacy notice provides information on how Synapto collects and processes your personal data, including through the provision of its platform and services.

Important information and who we are

Synapto Ltd, a Limited Company is the controller and responsible for your personal data.

Contact details

Our full details are:

Full name of legal entity: Synapto Ltd

Name or title of Data Representative: Daniel Gulyas

Email address: help@synaptopay.com

Postal address: 3rd Floor, 86-90 Paul Street, London, England, EC2A 4NE

The Data We Collect About You

We may collect, use, store, and transfer different kinds of personal data about you. These are grouped into the following categories:

- Identity Data: Includes first name, last name, username or similar identifiers, title, date of birth, and gender.
- Contact Data: Includes billing address, delivery address, email address, and telephone numbers.
- Financial Data: Includes bank account and payment card details.
- Transaction Data: Includes details about payments to and from you and other details of products and services you have purchased from us.
- 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, and other technology on the devices you use to access our website or services.
- Profile Data: Includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- Usage Data: Includes information about how you use our website, products, and services.
- Marketing and Communications Data: Includes your preferences in receiving marketing from us and our third parties, and your communication preferences.
- Explanation of Data Categories
- Identity Data and Contact Data are collected to uniquely identify you and to communicate with you regarding our services.
- Financial Data and Transaction Data are required for processing payments and maintaining accurate transaction records.

- Technical Data and Usage Data are used to enhance user experience, optimize system performance, and improve our services.

- Profile Data and Marketing and Communications Data allow us to tailor our services and communications to your preferences and interests.

When signing up to Synapto services it is necessary to provide some of this information for the performance of our contract with you and/or your business. If you do not provide this data, then we will not be able to provide you with our service.

How We Collect Your Data

We use different methods to collect data from and about you, including:

1. **Direct Interactions: You may provide us with your Identity, Contact, and Financial Data when** you:

- Fill out forms on our website, platform or services.
- Register an account with us.
- Subscribe to our services.
- Request marketing to be sent to you.
- Provide feedback or contact us.

2. Automated Technologies or Interactions: As you interact with our website, we may automatically collect Technical Data and Usage Data. We collect this data using cookies, server logs, and other similar technologies.

3. Third Parties or Publicly Available Sources: We may receive personal data about you from:

- From our partners, for example those who refer you to our services.
- Analytics providers (such as Google Analytics) based outside the UK.
- Search information providers based inside or outside the UK.
- Technical and payment service providers who process transactions or provide financial verification services.
- Public databases or government registers.

2. **How we use your personal data (Why we collect your data)**

We will only use your personal data for the purpose for which we collected it which include the following:

- To register you as a new customer, both for Synapto, your chosen acquirer (payments processor) and to onboard you onto our partner, Nuapay's, Platform, for Open Banking, Direct Debit and Bank Payment services.
- To process and deliver your order.
- To manage your relationship with us.
- To enable you to participate in a prize draw, competition or complete a survey.
- To improve our website, products/services, marketing or customer relationships.

- To recommend products or services which may be of interest to you.
- To provide value added services to you, such as displaying summaries, analytics and reporting around your financial and transactional
- To carry out underwriting, pre-qualification and risk management services pertaining to credit or other financial products that you may qualify for

3. Our Legal basis to process your data

We use the personal data that we collect from and about you only for the purposes described in this privacy notice or for purposes that we explain to you at the time we collect your information. Depending on our purpose for collecting your information, we rely on one of the following legal bases:

- Legitimate interests – we will use or disclose your personal data for the legitimate interests of either Synapto or a third party, but only when we are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, these interests will normally be to: operate, provide and improve our business, including our website and platform; to communicate with you and respond to your questions; improve our services or use the insights to improve or develop marketing activities and promote our products and services; detect or prevent illegal activities (for example, fraud); and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, vendors and visitors. Where we require your data to pursue our legitimate interests or the legitimate interests of a third party, it will be in a way which is reasonable for you to expect as part of the running of our business/organisation and which does not materially affect your rights and freedoms.
- Contract - we require certain personal data in order to provide the goods and support the services you purchase or request from us;
- Consent – in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use, or disclose your personal data, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you;
- Legal obligation – there may be instances where we must process and retain your personal data to comply with laws or to fulfil certain legal obligations.

4. How we share your personal data

We may share your personal data with our Third-Party Providers. More detail can be found here:

- We will provide your data to the nominated payments provider, acquirer or third party institution that you have asked us to onboard you to for the purposes of providing you acquiring merchant services, online and instore, and Point of Sale System rental
- We will provide your data to the Nuapay, our Open Banking, Direct Debit and Bank Payment services provider, in order to enable you to make Open Banking, Direct Debit and Bank Payment payments (with Nuapay acting as registered PISP) and Open Banking, Direct Debit and Bank Payment data related to the bank account or accounts that you have provided consent for us to present data from (with Nuapay acting as a registered AISP, and Synapto Ltd acting as a registered UK PSD Agent)
- We may grant access to your data to carefully selected third parties to provide underwriting, pre-qualification and risk management services pertaining to credit or other financial products that you may qualify for
- Other third party service providers and partners who provide data processing services to us as necessary to provide you with our services (to provide functionality on, or help to enhance our platform or services), or who otherwise process personal data for purposes described in this privacy notice
- our group companies who provide data processing services to us as necessary to provide you with our services, or who otherwise process personal data for purposes described in this privacy notice

- any competent law enforcement body, regulatory, government agency, court or other third party (such as our professional advisers) where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights or so a third party can defend theirs, or (iii) to protect your vital interests or those of any other person;
- a buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this privacy notice; or
- any other person with your consent to the disclosure (obtained separately from any contract between us).

5. **International transfers**

At present, we do not transfer, store and process your personal data outside the UK. If there is a good reason in future for this to occur, we will notify you via email.

6. **Data Retention**

We retain the personal data we collect from you where we have an ongoing legitimate need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). When we have no ongoing legitimate need or legal reason to process your personal data, we will either delete or anonymise it.

7. **Your legal rights**

Individuals located in the UK and EEA have the following data protection rights. To exercise any of these rights contact us using the details provided at the front of this notice.

- You may **access, correct, update or request deletion** of your personal data.
- You can **object to processing** of your personal data, ask us to **restrict processing** of your personal data or **request portability** of your personal data, (i.e. your data to be transferred in a readable and standardised format).
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided at the beginning of this privacy notice. If you choose to opt out of marketing communications, we will still send you non-promotional emails, such as emails about your account or our ongoing business relations.
- If we have collected and processed your personal data with your consent, then you can **withdraw your consent** at any time by using the contact details provided at the beginning of this privacy notice. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a supervisory authority** about our collection and use of your personal data. For more information, please contact your local supervisory authority. Contact details for supervisory authorities in Europe are available [here](#) and for the UK [here](#). Certain supervisory authorities will require that you exhaust our own internal complaints process before looking into your complaint.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

