

Privacy notice

1. Introduction

1.1 Welcome to the Insync Labs Limited's privacy notice.

1.2 Insync Labs Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our platform called InSync (regardless of where you visit it from) and tell you about your privacy rights and how the UK data protection legislation protects you.

1.3 Please also use the *Glossary* to understand the meaning of some of the terms used in this privacy notice.

2. Important information and who we are

2.1 Purpose of this privacy notice

2.1.1 This privacy notice aims to give you information on how Insync Labs Limited collects and processes your personal data through your use of this platform, including any data you may provide through this platform when you purchase and interact with the service.

2.1.2 This platform is not intended for children and we do not knowingly collect personal data relating to children.

2.1.3 It is important that you read this privacy notice together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This privacy notice supplements other notices and privacy policies and is not intended to override them.

2.2 Controller

2.2.1 Insync Labs Limited is the controller and responsible for your personal data (collectively referred to as "**Insync Labs Limited**", "**we**", "**us**" or "**our**" in this privacy notice).

2.2.2 We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the data privacy manager using the details set out below.

2.3 Contact details

2.3.1 If you have any questions about this privacy notice or our privacy practices, please contact our data privacy manager in the following ways:

2.3.1.1 Full name of legal entity: Insync Labs Limited

2.3.1.2 Email address: support@insync-labs.com

2.3.2 You have the right to make a complaint to the Information Commissioner's Office (or the Information Commission as it will be known following Part 6 of Data (Use and Access) Act 2025), the UK regulator for data protection issues (www.ico.org.uk).

2.4 Changes to the privacy notice and your duty to inform us of changes

2.4.1 We keep our privacy notice under regular review.

2.4.2 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2.5 Third-party links

2.5.1 This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal data about you. We do not control these third-party websites and are not responsible for their privacy policies and statements. When you leave our platform, we encourage you to read the privacy policy and statements of every website you visit.

3. The data we collect about you

3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

3.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

3.2.1 **Identity Data** includes first name, last name, date of birth, gender and right to work checks (for example passport);

3.2.2 **Contact Data** includes delivery address, email address and telephone numbers;

3.2.3 **Financial Data** includes bank account details;

3.2.4 **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 this website;

3.2.5 **Profile Data** includes your username and password, your job title and relevant place of work, your interests, preferences, feedback and survey responses;

3.2.6 **Usage Data** includes information about how you use our platform; and

3.2.7 **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

3.3 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific platform feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

3.4 We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3.5 Where we need to collect personal data by law, or under the terms of a contract we have with your employer of which you act as the representative, and you fail to provide that personal data when requested, we may not be able to perform the contract we have or are trying to enter into with your employer (for example, to provide your employer with our services). In this case, we may have to cancel a service your employer has with us but we will notify you if this is the case at the time.

4. **How is your personal data collected?**

4.1 We use different methods to collect personal data from and about you including through:

4.1.1 **Direct interactions.** You may give us your Identity, Contact, Financial and Profile Data by filling in forms or by corresponding with us by email or otherwise. This includes personal data you provide when you:

4.1.1.1 apply for our services;

- 4.1.1.2 create an account on our platform;
- 4.1.1.3 subscribe to our service or publications;
- 4.1.1.4 request marketing to be sent to you; or
- 4.1.1.5 give us feedback or contact us.

4.1.2 **Automated technologies or interactions.** As you interact with our platform, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie clause below for further details.

4.1.3 **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:

- 4.1.3.1 Technical and Usage Data from the following parties:
 - 4.1.3.1.1 analytics providers such as Google based outside the UK;
 - 4.1.3.1.2 advertising networks based inside the UK; and
 - 4.1.3.1.3 search information providers such as Google based outside the UK.
- 4.1.3.2 Identity, Contact and Profile Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.

5. **How we use your personal data**

5.1 We will only use your personal data when the UK data protection legislation allows us to. Most commonly, we will use your personal data in the following circumstances:

- 5.1.1 where we need to perform the contract we are about to enter into or have entered into with your employer of which you act as the representative;
- 5.1.2 where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- 5.1.3 where we need to comply with a legal obligation; and
- 5.1.4 consent.

5.2 We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the lawful basis or bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

5.3 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/activity	Type of personal data	Lawful basis for processing including basis of legitimate interest
To register your employer as a new customer of which you act as the representative.	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with your employer of which you act as the representative. (b) Necessary for our legitimate interests (to enable us to communicate with your employer via you).
To process and deliver your employer's order including: (a) manage payments, fees and charges; and/or (b) collect and recover money owed to us.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary to comply with a legal obligation. (b) Performance of a contract with your employer of which you act as the representative. (c) Necessary for our legitimate interests (to recover debts due to us). (d) Consent.
To manage our relationship with you and/or your employer of which you act as the representative which will include: (a) notifying you about changes to our terms or privacy notice; and/or (b) asking you to leave a review or take a survey.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with your employer of which you act as the representative. (b) Necessary to comply with a legal obligation. (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services). (d) Consent.
To share reviews from our customer's representatives onto our platform.	(a) Identity (b) Contact (c) Profile	(a) Necessary for our legitimate interests (to promote our services to prospective customers using reviews and feedback shared by our current customers). (b) Consent.

<p>To administer, operate and protect our business and our platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>(a) Identity (b) Contact (c) Financial (d) Technical (e) Profile (f) Usage (g) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business sale/disposal, acquisition, reorganisation or group restructuring exercise). (b) Necessary to comply with a legal obligation. (c) Consent.</p>
<p>To deliver relevant platform content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.</p>	<p>(a) Identity (b) Contact (c) Technical (d) Profile (e) Usage (f) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy). (b) Consent.</p>
<p>To use data analytics to improve our platform, services, marketing, customer relationships and experiences.</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to define types of customers for our services, to keep our platform updated and relevant, to develop our business and to inform our marketing strategy). (b) Consent.</p>
<p>To make suggestions and recommendations to you about services that may be of interest to you.</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>(a) Necessary for our legitimate interests (to develop our services and grow our business). (b) Consent.</p>

5.4 Marketing

5.4.1 We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

5.5 Promotional offers from us

- 5.5.1 We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).
- 5.5.2 You will receive marketing communications from us if you have requested information from us or your employer (of which you act as the representative) has purchased services from us and you have not opted out of receiving that marketing.
- 5.6 Third-party marketing
 - 5.6.1 We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.
- 5.7 Opting out
 - 5.7.1 You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.
 - 5.7.2 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchased by your employer, service experience or other transactions.
- 5.8 Change of purpose
 - 5.8.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
 - 5.8.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
 - 5.8.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.
- 6. **Cookies**
 - 6.1 Our platform uses cookies to distinguish you from other users of our platform. This helps us to provide you with a good experience when you browse our platform and also allows us to improve it.

6.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

6.3 We may use the following cookies:

6.3.1 **Strictly necessary cookies.** These are cookies that are required for the operation of our platform. They include, for example, cookies that enable you to log into secure areas of our platform, use a shopping cart or make use of e-billing services.

6.4 You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name	Purpose	More Information
PHPSESSID	To provide functions across pages.	Strictly necessary Expiry: session
active_org	To maintain the selected organisation context across platform pages.	Strictly necessary Expiry: 90 days
insync_rid	To prevent duplicate or excessive submissions and enables accurate counting of unique respondents across reporting cycles	Strictly necessary Expiry: 180 days The cookie contains a randomly generated identifier. A derived pseudonymous identifier is stored securely in the database to support accurate unique respondent counting across reporting periods
insync_set_{organisation_id}	To group responses submitted on the same day into a response set to ensure accurate daily reporting	Strictly necessary Expiry: at the end of each day

- 6.5 We do not share the information collected by the cookies with any third parties.
- 6.6 You can choose which analytical, functionality and targeting cookies we can set by clicking on the button(s):
- 6.7 However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

7. **Disclosures of your personal data**

7.1 We may share your personal data with the parties set out below for the purposes set out in the table under *How we use your personal data* above.

7.1.1 Internal Third Parties as set out in the *Glossary*.

7.1.2 External Third Parties as set out in the *Glossary*.

7.1.3 Specific third parties including but not limited to:

7.1.3.1 partner organisations, for example Durham University and Northern Accelerator;

7.1.3.2 Microsoft;

7.1.3.3 Krystal Hosting Ltd t/a Krystal.

7.1.4 Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets or where we undertake any internal reorganisation or restructuring. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

7.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the UK data protection legislation. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

8. **International transfers**

8.1 Some of our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

8.2 Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- 8.2.1 we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data;
- 8.2.2 where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.
- 8.3 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.
9. **Data security**
- 9.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 9.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
10. **Data retention**
- 10.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 10.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 10.3 By law we have to keep basic information about our customers and customers' representatives (including Contact, Identity and Profile Data) for six years after they cease, or the representative's employer, ceases being customers or suppliers for tax purposes.
- 10.4 In some circumstances you can ask us to delete your personal data: see *your legal rights* below for further information.

10.5 In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

11. **Your legal rights**

11.1 Under certain circumstances, you have rights under the UK data protection legislation in relation to your personal data. This includes the right to:

11.1.1 *request access to your personal data;*

11.1.2 *request correction of your personal data;*

11.1.3 *request erasure of your personal data;*

11.1.4 *object to processing of your personal data;*

11.1.5 *request restriction of processing your personal data;*

11.1.6 *request transfer of your personal data; and*

11.1.7 *withdraw consent.*

11.2 If you wish to exercise any of the rights set out above, please contact us.

11.3 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

11.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

11.5 We aim to respond to all legitimate requests within one month of receipt. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. **Glossary**

12.1 **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive

and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

12.2 **Performance of Contract** means processing your personal data where it is necessary for the performance of a contract to which your employer is a party and you act as the representative or to take steps at your employer's request before entering into such a contract.

12.3 **Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation to which we are subject.

12.4 **External Third Parties** means:

12.4.1 Service providers acting as processors based in the UK who provide IT and system administration services.

12.4.2 Professional advisers acting as separate controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.

12.4.3 HM Revenue & Customs, regulators and other authorities acting as separate controllers based in the UK who require reporting of processing activities in certain circumstances.

12.5 **Your Legal Rights**

12.5.1 You have the right to:

12.5.1.1 **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

12.5.1.2 **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- 12.5.1.3 **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 12.5.1.4 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 12.5.1.5 **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
- 12.5.1.5.1 If you want us to establish the data's accuracy.
 - 12.5.1.5.2 Where our use of the data is unlawful but you do not want us to erase it.
 - 12.5.1.5.3 Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - 12.5.1.5.4 You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

12.5.1.6 **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

12.5.1.7 **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.