



# Privacy Policy

**Effective Date:** 15.11.2024.

Vinciway Ltd. (“Vinciway,” “we,” “us,” or “our”) is committed to protecting your privacy and ensuring the security of your personal data. This Privacy Policy explains how we collect, use, and protect your information when you use our platform and services.

## 1. About Vinciway

- **Company Name:** Vinciway Ltd.
- **Registered Address:** 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ.
- **Company Number:** 14557857.
- **Contact Email:** support@vinciway.com

Vinciway is a business-to-business (B2B) educational platform that facilitates content creation, collaboration, and exploration for registered companies and their users.

## 2. Information We Collect

We may collect the following types of information:

### 2.1. Personal Data Provided by Users

- **Registration Information:** Your name, contact information such as email addresses.
- **Company Information:** Company name, user roles, contact details.
- **Content and Communications:** Data you upload or add whilst using the platform. Content you share, or communicate via the platform (e.g., pathways, shared cards).

### 2.2. Automatically Collected Data

- **Usage Data:** IP addresses, browser types, device information, time and date of access, application journey, page views and other information necessary to conduct the business in a secured and thorough way.
- **Cookies:** Information collected through cookies and similar technologies to enhance user experience.



### 2.3. Third-Party Data

Data from integrated services such as Clarity, Amplitude, Postmark, Voiceflow, GoHighLevel (GHL) and Google Ads Manager and Google Analytics. These services may collect metrics on user interactions with the platform (e.g., click behaviour, navigation paths).

## 3. How We Use Your Information

We use the collected data to:

- Provide and operate the Vinciway platform.
- Authenticate users and secure access using Auth0 as an identity provider.
- Improve user experience by analysing metrics through Clarity, Amplitude, and Google Analytics.
- Improving ads by using Google Ads Manager
- Conducting user support, business intelligence and sales with GHL and Voiceover,
- Send service updates and notifications via Postmark or other communication tools.
- Respond to inquiries, provide support, and resolve technical issues.
- Enforce our Terms and Conditions and ensure compliance with laws.

## 4. Legal Basis for Processing

Under the UK GDPR, we process your data based on:

- **Performance of a Contract:** To provide the platform and services as agreed with Registered Companies.
- **Legitimate Interests:** For platform improvement, security, and analytics.
- **Consent:** Where required, such as for cookies or marketing communications.
- **Legal Obligations:** To comply with applicable laws and regulations.

## 5. Sharing Your Information

We do not sell your personal data. However, we may share your information with:

- **Registered Companies:** Other users and administrators within your company for account management, oversight or delivering the core function of the software.
- **Service Providers:** Third parties such as Auth0, Clarity, Amplitude, Postmark, and Google Analytics, solely to support platform functionality and performance.
- **Legal Authorities:** When required by law, court order, or legal process.



## 6. International Transfers

If your data is transferred outside the UK or European Economic Area (EEA), we ensure appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs) or equivalent legal mechanisms.

### 6.1. List of the locations outside EEA / UK where your data is stored.

- n/a

## 7. Data Retention

We retain your data for as long as necessary to fulfil the purposes outlined in this Privacy Policy, or as required by law. Upon termination of your account, we will delete or anonymize your data within 90 days unless further retention is required for legal or compliance purposes.

## 8. Your Rights

Under the UK GDPR, you have the following rights:

- **Access:** Request a copy of your personal data.
- **Correction:** Update inaccurate or incomplete data.
- **Deletion:** Request the deletion of your data where legally permissible.
- **Restriction:** Limit the processing of your data in certain circumstances.
- **Objection:** Object to data processing based on legitimate interests or for marketing purposes.

To exercise your rights, contact us at [support@vinciway.com](mailto:support@vinciway.com).

## 9. Cookies and Tracking Technologies

We use cookies to:

- Enhance user experience.
- Connect your identity to all platforms together without a need to re-authenticate.
- Analyse platform performance and user behaviour via tools like Clarity, Amplitude, and Google Analytics.



You can manage cookie preferences through your browser settings. For more information, see our Cookie Policy.

## **10. Data Security**

We implement appropriate technical and organisational measures to protect your data, including encryption, access controls, and regular security assessments. We have also narrowed the amount of data we collect to the strict minimum that is necessary for us to efficiently operate.

### **10.1 Hosting and storage**

All of your data is stored on UK or European Economic Area (EEA) territories unless stated otherwise in point 6.1 of this policy.

### **10.2 Disclaimer**

We are committed to use the best of our knowledge and abilities to keep the system safe and secured. However, in scenarios beyond our full control we cannot guarantee the absolute security of your data.

## **11. Children's Data**

The Vinciway platform is not intended for children under 16 years of age, however the nature of this software does not fall into the category where such age such be a limit. We do not knowingly collect data from individuals under this age.

## **12. Updates to This Privacy Policy**

We may update this Privacy Policy to reflect changes in our practices or legal requirements. We will notify you of material changes via email or through the platform.

## **13. Contact Us**

If you have questions or concerns about this Privacy Policy or your data, contact us at:

- **Email:** [support@vinciway.com](mailto:support@vinciway.com)
- **Address:** 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ

**Document change log**

<b>Version indicator</b>	<b>Date released</b>	<b>Effective from</b>
v1	16 November 2024	16 November 2024