

X1 Labs customer privacy notice

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Telephone

07495956532

Email

katie@x1labs.co.uk

What information we collect, use, and why

We collect or use the following information to **provide and improve products and services for clients**:

- Names and contact details
- Addresses
- Occupation

- Payment details (including card or bank information for transfers and direct debits)
- Transaction data (including details about payments to and from you and details of products and services you have purchased)
- Usage data (including information about how you interact with and use our website, products and services)
- Digital assets provided by the client in order to provide our services.

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Payment details
- Correspondence

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)

- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legitimate interests** – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - o We collect information to carry out our work relating to software development, including names, addresses, emails or telephone numbers, to implement into the final product where appropriate. For

example, a website project may contain a contact page, enabling client outreach. To minimise the risk of exposing the data to the public, only the data requested by the client to be published will be published.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Where we get personal information from

- Directly from you
- Third parties:
 - o Payment details collected through PayPal.
- From websites or social media pages relevant to the organisation or person using our services.

How long we keep information

Record Type	Description	Retention Period
Client Contracts	Signed agreements with clients	4 years after expiration
Project Documentation	Any specifications or designs for a project being developed	4 years after project completion
Invoices and Billing Records	Records of invoices sent and payments received	4 years
Software Source Code	Version-controlled source code for a project or system.	Indefinitely, or until made obsolete
Client Correspondence	Any email, meeting minutes or letter communication with clients	4 years
Legal Documents	Any legal agreements or documents	4 years

All data will be disposed through either secure digital deletion software, or by incineration.

Who we share information with

Data processors

PayPal

This data processor does the following activities for us: Manage our payment systems, for customer transactions.

DigitalOcean

This data processor does the following activities for us: Manage any databases or client servers which are needed for the deployment of our artefacts.

NetCup GmbH

This data processor does the following activities for us: Manage X1 Labs' personal server infrastructure, including services for contract storage, note-taking regarding client contracts and user data for X1 Labs in-house services.

Soverin B.V

This data processor does the following activities for us: Store and process any email-based communication for X1 Labs.

Proton AG.

This data processor does the following activities for us: Holds encrypted backups of invoices, receipts and contracts handled by X1 Labs.

SmallPdf AG.

This data processor does the following activities for us: Holds contracts requiring E-Signatures, manages E-Signatures provided by clients via the Sign.com platform.

GitHub (Microsoft Corporation)

This data processor does the following activities for us: Host version-controlled source code and project repositories for X1 Labs, including client project repositories where applicable.

Anthropic, PBC

This data processor does the following activities for us: Provide AI-assisted tooling and services used in the delivery of X1 Labs' software development and research activities, which may involve processing data inputs provided by clients.

Google LLC

This data processor does the following activities for us: Distribute and manage our Android application(s) via the Google Play Store, including app hosting, distribution and updates, billing for in-app purchases where applicable, and providing app performance, crash and usage diagnostics.

Others we share personal information with

- Professional or legal advisors
- Publicly on our website, social media or other marketing and information media
- Suppliers and service providers

Sharing information outside the UK

Where necessary, we may transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

Organisation name: DigitalOcean

Category of recipient: Cloud Computing Provider

Country the personal information is sent to: United States of America

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

Organisation name: NetCup GmbH.

Category of recipient: Cloud Computing Provider

Country the personal information is sent to: Germany

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

Organisation name: Soverin B.V

Category of recipient: Email Provider

Country the personal information is sent to: The Netherlands

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

Organisation name: Proton AG.

Category of recipient: Cloud Storage Provider

Country the personal information is sent to: Switzerland

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

Organisation name: SmallPdf AG.

Category of recipient: E-Signature Provider

Country the personal information is sent to: Switzerland

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

Organisation name: GitHub (Microsoft Corporation)

Category of recipient: Source Code Repository / Cloud Computing Provider

Country the personal information is sent to: United States of America

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

Organisation name: Anthropic, PBC

Category of recipient: AI Services Provider

Country the personal information is sent to: United States of America

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

Organisation name: Google LLC

Category of recipient: App Distribution Platform / Technology Provider

Country the personal information is sent to: United States of America

How the transfer complies with UK data protection law: The country or sector has been assessed as providing adequate protection to data subjects (also known as Adequacy Regulations or UK data bridge)

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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