

Privacy Policy

Last updated: October 24, 2026

How we process personal data and the content you store in SyncLayer.

This English version is provided for convenience. In case of discrepancy or conflict, the Spanish version of this document prevails.

Provider information

Trade name: SyncLayer

Provider: RAMIREZ ESPINOZA FIDEL RODOLFO

Status: Natural person domiciled in Peru

Tax ID (RUC): 10473434721

Address: Lima, Peru

Contact: founder@synclayer.co

Website: <https://synclayer.co>

1. Controller identity and scope

The controller of the personal data collected through <https://synclayer.co> and <https://app.synclayer.co> is RAMIREZ ESPINOZA FIDEL RODOLFO, Natural person domiciled in Peru, with RUC 10473434721, address at Lima, Peru and contact email founder@synclayer.co.

SyncLayer is the trade name used by the provider. SyncLayer is not an incorporated company, and the provider does not claim that the trade name is registered as a trademark.

This policy is issued under Law No. 29733, the Peruvian Personal Data Protection Law, and Supreme Decree No. 016-2024-JUS, which approves its regulation. We do not declare full compliance with foreign laws such as the GDPR or the CCPA; any such assessment will be carried out specifically for each market.

2. Personal data we process

We process user personal data and, separately, the content that users store in their workspaces. Not all workspace content is personal data of the account holder, but it may contain personal data of third parties.

Depending on the features you use, we may process the following categories:

- Identification and contact data: name, email address, language, country and, where applicable, data associated with the Google account used to sign in.
- Account and authentication data: user identifiers, credentials managed by the authentication system, registration date, last login date and security preferences.
- Usage data: workspaces, projects, tasks, notes, tables, documents, books, highlights, vocabulary, reading progress, activity and metadata required to operate the service.
- Billing data: plan, billing cycle, country, currency, payment history and transaction references. Full card or payment method data is processed by the enabled payment gateways and is not stored directly by SyncLayer.
- Technical data: IP address, browser, device, operating system, access logs, errors and performance metrics.
- Data sent to artificial intelligence features: the text or content you choose to send to features such as translation, explanation, vocabulary enrichment or image generation, together with the metadata required to provide the feature.

3. Content stored in workspaces and LingoLearn

The content you create or upload in SyncLayer — including documents, tasks, notes, tables, books, highlights and vocabulary — is stored to provide the service and, where applicable, to enable collaboration among workspace members.

PDF documents you upload to LingoLearn are processed to extract text, display pages, enable highlights and generate study features. If you use artificial intelligence features, the text or excerpt you send may be transmitted to external providers to produce the requested translation, explanation, enrichment or image.

Workspace content may be visible to the owner, administrators and members with sufficient permissions. The user who invites or administers a workspace is responsible for configuring those permissions appropriately and for having authorization to store third-party data.

Do not send sensitive, confidential or third-party data to artificial intelligence features without sufficient authorization. SyncLayer does not guarantee that AI-generated results are accurate, complete or suitable for a particular purpose.

4. Purposes of processing

We process personal data for the following purposes, to the extent applicable to the enabled features:

- Create and manage accounts, authenticate users and maintain service security.
- Provide SyncLayer features, including workspaces, projects, tasks, documents, notes, tables, reports and LingoLearn.
- Process payments, manage subscriptions, renewals, cancellations and billing when paid plans are enabled.
- Personalize the experience, remember preferences and display content in the selected language or country.
- Provide features assisted by artificial intelligence and process the content required for them.
- Send operational, security and support communications, as well as marketing communications where a legal basis or consent permits it.
- Prevent fraud, abuse, unauthorized access and uses contrary to the Terms of Service.
- Comply with legal obligations, respond to competent authority requests and exercise or defend rights.
- Conduct internal analysis, improve the product and measure feature performance.

5. Legal bases

Processing may be based on the data subject's consent, the performance of the contractual relationship, compliance with legal obligations or other bases recognized under Peruvian law, depending on the specific case.

Mere use of the service is not considered sufficient consent for all processing or all transfers. Where consent is required, we will request it expressly and it may be withdrawn without affecting the lawfulness of prior processing.

Where a basis other than consent is invoked, SyncLayer will assess its applicability under Law No. 29733 and its regulation. The concept of legitimate interest used in other jurisdictions is not automatically transplanted into Peruvian law.

6. Authentication and security

SyncLayer adopts reasonable technical, organizational and administrative measures to protect personal data against loss, unauthorized access, alteration, disclosure or destruction. The specific scope of these measures may vary depending on the infrastructure and providers used.

We do not guarantee absolute security or that the service is free from incidents. We also do not promise end-to-end encryption, anonymization of all content or immediate automatic deletion of all data, unless a specific feature expressly states otherwise.

Users are responsible for keeping their credentials confidential and for notifying any unauthorized access to founder@synclayer.co.

7. Cookies and similar technologies

SyncLayer may use cookies and local storage strictly necessary to maintain the session, remember preferences, improve security and enable the basic operation of the service.

If analytics, advertising or non-essential cookies are introduced, an information and consent mechanism will be enabled where required. The availability and configuration of these technologies will be informed where applicable.

You can configure your browser to block or delete cookies. Some features may stop working properly.

8. Providers and processors

SyncLayer does not sell personal data. To operate the service, it may rely on providers acting as processors or independent recipients, as applicable. Provider categories may include:

- Cloud infrastructure, hosting, storage and content delivery.
- Authentication and sign-in, including identity providers such as Google when the user chooses that option.
- Payment gateways and billing processors, when paid plans are enabled.
- Artificial intelligence and language processing providers, when the user uses AI-assisted features.
- Email, support, analytics, monitoring, security and operational notifications.

The specific list of providers, their locations and their processing terms will be kept up to date and completed as new services are enabled.

Providers must process data in accordance with SyncLayer's instructions and applicable law. Where a provider acts as an independent recipient, its own privacy notice may apply.

9. International transfers

Some technology providers may be located outside Peru. Where personal data must be transferred to another country, SyncLayer will assess and adopt the measures and safeguards required under Peruvian law, including contractual clauses, security assessments or equivalent mechanisms where applicable.

The identification of cross-border flows and destination countries will be completed as the service providers are consolidated.

10. Retention and deletion

We retain personal data while the account remains active and for the time necessary to fulfill the purposes described, comply with legal obligations, resolve disputes and prevent fraud.

No single retention period applies to all data. Specific periods depend on the type of data, the purpose, the contractual relationship and applicable legal obligations.

You may request the deletion of your account or certain data. Where applicable, we will retain only the information strictly necessary to comply with legal, accounting, tax or security obligations, duly blocked and for the applicable legal period.

We do not promise recovery of deleted content and do not guarantee the existence, scope or duration of backups. Backups are not offered as a user recovery feature.

11. Data subject rights

As a data subject, you may exercise the rights recognized by Peruvian law, including:

- Access the personal data that SyncLayer processes about you and information related to its processing.
- Request rectification of inaccurate, incomplete or outdated data.
- Request cancellation or deletion of your data where legally applicable.
- Object to certain processing for legitimate reasons related to your particular situation.
- Withdraw your consent where processing is based on it.
- File a complaint with the Peruvian National Authority for Personal Data Protection (ANPD), without prejudice to other legal remedies.

To exercise these rights, write to founder@synclayer.co stating your name, the right you wish to exercise and the information necessary to identify you. We may request additional information to verify your identity and prevent unauthorized access.

We will respond within the periods established by applicable law.

12. Minors

The service is intended for adults or for minors who have the authorization and supervision of their parent or legal guardian, in accordance with applicable law.

We do not perform automated age verification. If we become aware that we have collected personal data from a minor without the required authorization, we will take reasonable steps to delete it or regularize the situation.

13. Security incidents

If an incident significantly affects personal data, SyncLayer will adopt reasonable containment and assessment measures and make the notifications required by applicable law.

Deadlines, channels and notification responsibilities will be adjusted in accordance with applicable law.

14. Artificial intelligence and external providers

Translation, explanation, vocabulary enrichment, image generation and other AI-assisted features may involve sending text or content to external providers. Processing by those providers is also governed by their own terms and policies.

We do not claim that artificial intelligence providers do not use data to train models. That circumstance must be verified with each provider and may vary depending on the service, configuration and plan. Do not send confidential or sensitive information to these features.

AI-generated results may be inaccurate, incomplete or inappropriate. Users must review them before use and should not rely on them as the sole source for legal, medical, financial or other professional decisions.

15. Compliance, data banks and review

This policy is issued as a technical draft for legal review. We do not declare full compliance with Law No. 29733, its regulation or foreign laws until the corresponding assessment is completed.

The registration of personal data banks with the competent authority, the identification of cross-border flows, the assessment of additional safeguards and the obligations applicable by country or market are under review. Where required, the necessary registrations, communications and updates will be made.

This policy is under legal review and may be updated once operational validations and applicable obligations are completed.

16. Changes

We may update this Privacy Policy to reflect changes in the service, applicable law or our processing practices.

The current version will be published at <https://synclayer.co/en/privacy> and will state the last updated date. Where changes are material, we may communicate them through reasonable means, such as email or notices within the platform.

17. Contact

If you have questions, requests or complaints regarding this Privacy Policy or the processing of your personal data, you can contact us at founder@synclayer.co.

You may also use the support channels available within the platform.