Privacy Notice

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Company	Transceve Ltd (Company No. 16191698)
Address	Allia Future Business Centre, Kings Hedges Road, Cambridge, England, CB4 2HY
Email	hello@transceve.org
Website	https://transceve.org
ICO Registration	[To be completed upon ICO registration]

1. Who We Are

Transceve Ltd ("Transceve", "we", "us", "our") is a private limited company registered in England and Wales (Company No. 16191698). We operate the Transceve platform, an AI-assisted impact measurement service for third sector organisations.

Transceve acts as a data processor on behalf of our client organisations (data controllers) who use our platform to analyse conversation data. In some circumstances, Transceve also acts as a data controller in its own right — for example, in relation to account management and billing data.

This Privacy Notice explains how we collect, use, store, and protect personal data, and the rights you have in relation to that data.

2. What Data We Process

2.1 Account and billing data (Controller)

When an organisation registers to use Transceve, we collect:

- Organisation name, address, and contact details
- User names and email addresses
- Billing and payment information (processed via our payment provider)
- Usage records and account activity logs

2.2 Conversation and analysis data (Processor)

Our core service involves processing conversation recordings and transcripts uploaded by our clients. This data may include:

- Audio, video, or text recordings of conversations
- Transcripts of those conversations
- Automated analysis outputs (BPN scores, qualitative extractions)
- Pseudonymous service user references provided by the client

This data is processed on behalf of our client organisations, who remain the data controllers. We process it solely according to their instructions and the terms of our Data Processing Agreement.

2.3 Special category data

Conversation data processed through Transceve may contain special category data as defined by UK GDPR Article 9, including information about health, mental health, social care needs, or other sensitive personal matters. We apply heightened security and access controls to all uploaded content.

3. Lawful Basis for Processing

We rely on the following lawful bases under UK GDPR:

- Contract — to provide the Transceve service to our clients
- Legal obligation — to comply with applicable laws and regulations
- Legitimate interests — for platform security, fraud prevention, and service improvement, where such interests do not override the rights of individuals
- Consent — where we have sought and obtained explicit consent for specific processing activities, including optional participation in model training (see Section 8)

4. How We Use Personal Data

4.1 Account data

- To create and manage your organisation's account
- To process payments and manage your subscription
- To send service communications, including notices about your account, usage, and trial status
- To provide customer support
- To comply with legal and regulatory obligations

4.2 Conversation and analysis data

- To transcribe and analyse uploaded conversation recordings
- To generate BPN impact measurement scores and qualitative extractions
- To produce aggregated analytics and reports for your organisation
- To generate grant report drafts at your request

We do not use conversation data for any purpose other than delivering the Transceve service, unless your organisation has explicitly opted in to the model training programme described in Section 8.

5. Data Retention

Account data	7 years from account closure (legal/tax obligation)
Conversation recordings	Deleted within 30 days of upload, unless you request earlier deletion

Transcripts and analysis	Retained for the duration of your subscription, then deleted within 90 days of account closure
Audit logs	2 years
Billing records	7 years

You may request deletion of specific analyses or all data at any time by contacting us at hello@transceve.org.

6. Data Security

We implement appropriate technical and organisational measures to protect personal data, including:

- Encryption of data in transit (TLS 1.3) and at rest (AES-256)
- Role-based access controls — only authorised personnel can access your data
- All AI processing runs on infrastructure within the European Economic Area or United Kingdom
- Conversation data is never sent to third-party cloud AI services unless you explicitly configure this
- Regular security assessments and penetration testing
- Staff training on data protection and information security

7. Data Sharing

We do not sell personal data to third parties. We may share data in the following limited circumstances:

- With our infrastructure providers (hosting, database), who are bound by data processing agreements and process data only on our instruction
- With payment processors for billing purposes
- Where required by law, court order, or regulatory authority
- In the event of a merger or acquisition, where the acquiring entity will be bound by the same obligations

8. Model Training — Optional Opt-In

Transceve is committed to improving the accuracy of our AI models over time. We may develop a programme that allows organisations to voluntarily contribute anonymised data to help train and refine our models.

Participation in this programme is entirely optional and requires explicit opt-in by the data controller (your organisation). If you opt in:

- Only anonymised, aggregated data would be used — no raw conversation recordings, transcripts, or personally identifiable information
- You may withdraw consent at any time without affecting your service
- We will provide full details of what data would be used and how before you opt in

We will never use personal data for model training without a clear lawful basis and without first obtaining explicit consent from the relevant data controller. By default, your data is never used for training purposes.

9. Your Rights

Under UK GDPR, individuals whose data we process have the following rights:

- Right of access — to request a copy of personal data we hold
- Right to rectification — to correct inaccurate or incomplete data
- Right to erasure — to request deletion of personal data in certain circumstances
- Right to restriction — to limit how we process your data
- Right to data portability — to receive data in a structured, machine-readable format
- Right to object — to object to processing based on legitimate interests
- Rights related to automated decision-making — Transceve's analysis outputs are generated by automated AI systems; no solely automated decisions with legal or significant effects are made about individuals

To exercise any of these rights, contact us at hello@transceve.org. We will respond within one month.

If you are not satisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO) at ico.org.uk.

10. Cookies

The Transceve platform uses essential cookies to manage user sessions and authentication. We do not use tracking or advertising cookies. A full cookie policy is available at transceve.org/cookies.

11. Changes to This Notice

We may update this Privacy Notice from time to time. We will notify active users of any material changes by email at least 30 days before they take effect. The current version is always available at transceve.org/privacy.

12. Contact

For any questions about this Privacy Notice or our data practices, contact us at:

Email	hello@transceve.org
Post	Data Protection, Transceve Ltd, Allia Future Business Centre, Kings Hedges Road, Cambridge, England, CB4 2HY