

# Data Protection Policy

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## 1. Policy Statement

SeenEm<sup>®</sup> is committed to protecting the privacy, security and integrity of personal and confidential data. We process personal data lawfully, fairly and transparently, in accordance with **UK data protection legislation** and best practice.

This policy explains how data is collected, used, stored, protected and controlled within the SeenEm<sup>®</sup> platform.

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## 2. Scope

This policy applies to all personal and confidential data processed by SeenEm<sup>®</sup>, including but not limited to:



Individual user data



Customer and client records



Employee and worker data



Proprietary and operational information



System and audit data

It applies to all users of the SeenEm<sup>®</sup> application and anyone processing data on SeenEm<sup>®</sup>'s behalf.

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## 3. Legal Framework

SeenEm<sup>®</sup> complies with all applicable UK data protection and privacy legislation, including:



**UK General Data Protection Regulation (UK GDPR)**



**Data Protection Act 2018**



**Privacy and Electronic Communications Regulations (PECR)**



**Computer Misuse Act 1990**



**Network and Information Systems Regulations (NIS) where applicable**

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## 4. Data Controller

SeenEm® acts as the **Data Controller** for personal data processed within the SeenEm® platform, except where otherwise agreed in writing.

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## 5. Types of Data Processed

SeenEm® may process the following categories of data:



Personal identification data



Contact information



Employment and verification data



Audit and validation records



User-generated content within the app

SeenEm® does **not** process data unnecessarily or beyond stated purposes.

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## 6. Lawful Basis for Processing

Personal data is processed under one or more lawful bases, including:



Consent



Performance of a contract



Legal obligation



Legitimate interests

Users are informed of the purpose and lawful basis at the point of data collection.

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## 7. Data Storage & Location

All data processed by SeenEm®:



Is **stored exclusively within the United Kingdom**



**Does not leave the UK under any circumstances**



Is hosted on **secure UK-based servers**



Is protected by **Cyber Essentials Plus-certified infrastructure**



Is supported by **disaster recovery, redundancy and business continuity controls**

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## 8. Data Security Measures

SeenEm® implements robust technical and organisational measures, including:



Encrypted data storage and transmission



Secure authentication and access controls



Role-based permissions



Continuous monitoring and logging



Regular security testing and updates

Access to data is strictly limited to authorised users only.

## 9. Individual Data Ownership & Control

Individuals remain **fully responsible for and in control of their own data** within the SeenEm<sup>®</sup> application.

Users can:



View their data at any time



Amend or update their information



Add new information



Delete data permanently

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## 10. Data Deletion & Erasure

Where a user deletes data within the SeenEm<sup>®</sup> application:



The data is **permanently deleted**



It is removed from **all parts of the database**



No further access is permitted



No copies are retained



The deletion is irreversible

This complies with the **right to erasure** under UK GDPR.

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## 11. Access Control & Entity Removal

Users have full control over who can view their data.

At any time, a user may:



Remove specific agencies



Remove individual users



Restrict or revoke access to their current information

Once access is removed, the affected party can no longer view, process or retrieve the data.

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## 12. Data Sharing

SeenEm<sup>®</sup> does not sell personal data.

Data is only shared:



With entities explicitly authorised by the individual



Where required by UK law or a lawful authority

No data is transferred outside the United Kingdom.

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## 13. Data Retention

Data is retained only for as long as necessary to fulfil its purpose or meet legal obligations.

Retention periods are reviewed regularly and data is securely deleted when no longer required.

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## 14. Data Subject Rights

Individuals have the right to:



Access their personal data



Rectify inaccurate data



Erase their data



Restrict processing



Object to processing



Data portability

Requests can be exercised directly through the SeenEm® application.

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## 15. Data Breaches

SeenEm® has procedures in place to detect, manage and report data breaches.

Where required, breaches will be:



Reported to the Information Commissioner's Office (ICO)



Communicated to affected individuals without undue delay

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## 16. Responsibilities

All individuals working for or with SeenEm® must:



Comply with this policy



Protect confidential data



Report any suspected data breaches immediately

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## 17. Review and Approval

This policy is reviewed annually by the Board of SeenEm® to ensure continued compliance with UK law and evolving best practice.

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**Approved by:** The Board of SeenEm®

**Review frequency:** Annual

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