Agusta-ai
EXCEPTIONAL DOCUMENTATION COMPLIANCE

https://www.agusta-ai.uk

Privacy Policy

Last updated: 17 October 2026 Version: 1.0

This Privacy Policy explains how Agusta-ai ("we", "us", or "our") collects, uses, stores, and protects your personal data when you use the Agusta-ai platform at https://www.agusta-ai.uk

We are committed to protecting your privacy and complying with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025, and equivalent data protection legislation in the jurisdictions in which we operate.

1. Data Controller

The data controller for personal data processed through the Service can be contacted on the contact email provided on our website: https://www.agusta-ai.uk

2. Data We Collect

2.1 Account Data

When you register for an account, we collect your name, email address, and subscription tier. This data is necessary to provide the Service and manage your account.

2.2 Payment Data

Payment transactions are processed by Stripe, Inc. We receive confirmation of payment and your subscription status from Stripe. We do not store your full payment card number, CVV, or bank account details. Stripe's privacy policy governs the processing of your payment data.

2.3 Application Data

When you use the compliance checking features of the Service, you may upload immigration application forms, supporting documents, and personal information relating to yourself or your clients. This data is processed solely to generate your compliance assessment and is not used for any other purpose without your explicit consent.

2.4 Usage Data

We collect technical data about your use of the Service, including IP address, browser type, device type, pages visited, and session duration. This data is used to maintain and improve the Service and to detect and prevent fraud and abuse.

2.5 Communications Data

If you contact us by email or through the website, we retain records of that correspondence to respond to your enquiry and to improve our customer service.

3. Legal Basis for Processing

We process your personal data on the following legal bases under UK GDPR:

Table 1. Legal basis for data processing

Data Category	Legal Basis	Purpose
Account data	Contract (Article 6(1)(b))	To provide the Service you have subscribed to
Payment data	Contract (Article 6(1)(b))	To process your subscription payment
Application data	Contract (Article 6(1)(b))	To generate your compliance assessment
Usage data	Legitimate interests (Article 6(1)(f))	To maintain, secure, and improve the Service
Communications data	Legitimate interests (Article 6(1)(f))	To respond to your enquiries
Marketing communications	Consent (Article 6(1)(a))	To send you updates about the Service

4. AI Processing and Automated Decision-Making

4.1 How AI Processes Your Data

The Service uses artificial intelligence, including large language models (Qwen3) and vector search technology (ChromaDB), to analyse your application data and generate compliance assessments. This processing is automated but does not constitute solely automated decision-making within the meaning of Article 22 of the UK GDPR, as the output is an informational assessment that requires human review and decision-making before any action is taken.

4.2 AI Training

We do not use your personal data or application data to train our AI models without your explicit consent. Our AI models are trained on publicly available legal data, including Home Office Immigration Rules, case law from BAILII, and equivalent public sources in the USA, Canada, France, and Germany.

4.3 ICO AI Guidance Compliance

Our AI processing practices are designed in accordance with the ICO's Guidance on AI and Data Protection. We apply data minimisation principles, ensure transparency about AI processing, and maintain human oversight of AI-generated outputs.

5. Data Sharing

We share your personal data only in the following circumstances:

• Stripe, Inc.: for payment processing. Stripe is certified under the EU-US Data Privacy Framework.

• Supabase, Inc.: for database hosting. Your data is stored on servers located in the European Union (West EU — Ireland region).

• Hetzner Online GmbH: for server infrastructure. Our primary server is located in Nuremberg, Germany, within the European Economic Area.

• Cloudflare, Inc.: for content delivery and DDoS protection. Cloudflare processes limited technical data.

• Legal and regulatory authorities: where required by law, court order, or regulatory obligation.

We do not sell your personal data to third parties. We do not share your application data with immigration authorities or the Home Office.

6. International Data Transfers

Our primary infrastructure is located within the United Kingdom and European Economic Area. Where data is transferred to third-party service providers outside the UK or EEA (including Stripe and Cloudflare, which have US operations), we ensure appropriate safeguards are in place, including Standard Contractual Clauses approved by the ICO or equivalent mechanisms.

7. Data Retention

Table 2. Data retention periods

Data Category	Retention Period	Reason
Account data	Duration of account plus 2 years	Legal and contractual obligations
Payment records	7 years	UK tax and accounting requirements
Application data	90 days from upload	Sufficient for assessment purposes
Compliance assessment reports	12 months	To allow you to access previous assessments
Usage data	13 months	Analytics and security purposes
Communications data	3 years	Customer service and dispute resolution

You may request earlier deletion of your data subject to our legal obligations to retain certain records.

8. Your Rights Under UK GDPR

You have the following rights in relation to your personal data:

• Right of access: to request a copy of the personal data we hold about you

• Right to rectification: to request correction of inaccurate or incomplete data

• Right to erasure: to request deletion of your data where there is no legitimate reason for us to continue processing it

• Right to restriction: to request that we restrict processing of your data in certain circumstances

• Right to data portability: to receive your data in a structured, machine-readable format

• Right to object: to object to processing based on legitimate interests

• Right not to be subject to solely automated decision-making: to request human review of any automated decision that significantly affects you

To exercise any of these rights, please contact us at the contact email provided on our website https://www.agusta-ai.uk We will respond within one calendar month. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk if you believe we have not handled your data lawfully.

9. Cookies

The Service uses essential cookies to maintain your session and authentication. We use analytics cookies to understand how users interact with the Service. You may manage your cookie preferences through the cookie consent banner on the website. We do not use advertising or tracking cookies.

10. Children's Data

The Service is not directed at children under the age of 18. We do not knowingly collect personal data from children. If you believe we have inadvertently collected data from a child, please contact us at the contact email provided on our website https://www.agusta-ai.uk and we will delete it promptly.

11. Security

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, or destruction. These measures include encrypted data transmission (TLS), server-level firewall protection, SSH key authentication, Tailscale VPN for administrative access, and access controls limiting data access to authorised personnel only.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or applicable law. We will notify you of material changes by email or by posting a notice on the website. The date of the most recent update is shown at the top of this document.

https://www.agusta-ai.uk

13. Contact

For any questions about this Privacy Policy or our data practices, please contact us on the contact email provided on our website: https://www.agusta-ai.uk