

AuraEye Solutions Ltd

Privacy Policy & Data Removal Procedure

GDPR (UK & EU) · India DPDPA 2023 Compliant

Version 1.0 · Effective Date: 1 Sept 2025
Last Reviewed: March 2026

1. Introduction

AuraEye Solutions Ltd ("AuraEye", "we", "our", "us") is committed to protecting the privacy and personal data of all individuals who use our platform, services, and website ("Platform"). This Privacy Policy explains how we collect, use, store, share, and delete personal data, and sets out the rights available to you under applicable data protection law.

This Policy applies to:

- All users of the AuraEye web and mobile Platform (auraeyesolutions.com)
- Licensed practitioners and coaches using the AuraEye Practitioner Dashboard
- Individuals whose data is processed via the Emotional Wellbeing Index (EWI) assessment
- Visitors to our website

By using the Platform, you confirm that you have read and understood this Policy. If you do not agree, please do not use our services.

2. Data Controller Information

Company Name: AuraEye Solutions Ltd

Registered Address: 124-128 City Road, London, England, EC1V 2NX

Company Number: 16626628

Data Protection Contact: privacy@auraeyesolutions.com

ICO Registration Number: ZC060429

India Operations Contact: privacy@auraeyesolutions.com

AuraEye Solutions Ltd is the data controller for personal data processed through the Platform. Where practitioners collect data from their clients using AuraEye tools, practitioners act as independent data controllers for that client data.

3. Legal Bases for Processing

We process personal data only where a lawful basis exists under the UK GDPR / EU GDPR (Article 6) and the Digital Personal Data Protection Act 2023 (India) ("DPDPA").

3.1 Consent (GDPR Art. 6(1)(a) / DPDPA S.6)

Where you have given clear, informed consent — including for wellbeing assessments and sensitive data processing.

3.2 Contractual Necessity (GDPR Art. 6(1)(b))

Where processing is necessary to deliver the services you have subscribed to or requested.

3.3 Legitimate Interests (GDPR Art. 6(1)(f))

For fraud prevention, platform security, service improvement analytics, and professional communications, where your rights do not override these interests.

3.4 Legal Obligation (GDPR Art. 6(1)(c))

Where we must process data to comply with applicable law, including financial record-keeping and regulatory requirements.

3.5 Vital Interests (GDPR Art. 6(1)(d) / DPDPA S.6(5))

In emergencies where processing is necessary to protect life or safety, including where our Platform's safety-flag system identifies a critical wellbeing concern.

For special category data (health, mental wellbeing data processed via EWI), we rely on explicit consent (GDPR Art. 9(2)(a)) or, where applicable, substantial public interest in health and social care (Art. 9(2)(i)) as a secondary basis.

4. Data We Collect

4.1 Account & Identity Data

- Full name, email address, password (hashed)
- Professional credentials (for practitioner accounts)
- Billing address and payment information (processed by Stripe — not stored by AuraEye)

4.2 Wellbeing & Assessment Data

- EWI questionnaire responses (27 items across nine domains)
- Emotional Wellbeing Index scores and sub-domain results
- Session notes, goals, and progress records (practitioner-facing)
- Voice recordings (if voice journaling feature is used, stored locally or with explicit consent)

4.3 Usage & Technical Data

- IP address, browser type, device identifiers
- Log data, session timestamps, feature usage patterns

- Cookies and similar tracking technologies (see Section 10)

4.4 Communications Data

- Support requests and correspondence
- Survey responses and feedback

4.5 Data We Do Not Collect

- We do not collect biometric data, government ID numbers, or financial account credentials.
- We do not purchase or acquire personal data from third-party data brokers.

5. How We Use Your Data

We use collected data only for specified, explicit purposes:

- Delivering, operating, and improving the AuraEye Platform and EWI assessment engine
- Creating and managing your account and practitioner dashboard
- Processing payments and managing subscriptions via Stripe
- Generating wellbeing reports and personalised recommendations
- Sending service communications (account notices, updates, safety alerts)
- Marketing communications (only with explicit consent; unsubscribe available at all times)
- Fraud prevention, security monitoring, and legal compliance
- Aggregated, anonymised research to improve the psychometric validity of the EWI instrument

We will not use your data for automated decision-making that produces significant legal effects without human oversight, except where you have consented and have been informed of your right to request human review (GDPR Art. 22).

6. Data Sharing & Disclosure

We do not sell personal data. We share data only in the following circumstances:

6.1 Service Providers (Processors)

We engage third-party processors under Data Processing Agreements (DPAs):

- Stripe (payment processing — UK/EU/US)
- Netlify / Replit (hosting and deployment infrastructure)
- Email delivery providers (transactional and marketing emails)
- Analytics providers (anonymised usage data only)

6.2 Practitioners

If you are assessed through a licensed AuraEye practitioner, your EWI results may be shared with that practitioner. You will be informed of this before completing any assessment.

6.3 Legal Requirements

We may disclose data where required by law, court order, or regulatory authority (ICO in the UK; competent authority in India).

6.4 Business Transfers

In the event of a merger, acquisition, or sale of assets, data may be transferred to the successor entity. You will be notified with a minimum of 30 days' advance notice.

7. International Data Transfers

AuraEye operates across the UK, EU, and India. Data transfers are governed as follows:

7.1 UK to EU / EEA

Transfers are made under the UK-EU adequacy decision or, where applicable, Standard Contractual Clauses (SCCs).

7.2 UK / EU to India

India has not been granted an adequacy decision by the UK or EU at the date of this Policy. Transfers are therefore made under appropriate safeguards, including SCCs or binding corporate rules, and in compliance with DPDPA S.16 requirements on cross-border transfer.

7.3 India to UK / EU

Where AuraEye transfers data originating in India to the UK for processing, this is done with the consent of the data principal and in accordance with the DPDPA and any applicable rules issued by the Indian Government.

8. Data Retention

We retain personal data only for as long as necessary for its stated purpose or as required by law.

Data Category	Retention Period	Basis
Account Data	Duration of account + 2 years	Contract / Legal Obligation
EWI Assessment Data	Duration of account + 3 years	Legitimate Interest / Consent
Billing Records	7 years	UK tax law / HMRC requirements
Support Correspondence	3 years from resolution	Legitimate Interest
Marketing Consent Records	Until withdrawal + 1 year	ICO guidance
Anonymised Analytics	Indefinitely (no personal link)	Legitimate Interest
Server Access Logs	90 days	Security

Upon expiry of the retention period, data is securely deleted or irreversibly anonymised.

9. Your Rights

You have the following rights under applicable data protection law. We will respond to all verified requests within 30 days (extendable to 60 days for complex requests).

Right	Basis	How to Exercise
Access	GDPR Art. 15 / DPDPA S.11	Email privacy@auraeyesolutions.com
Rectification	GDPR Art. 16 / DPDPA S.12	Via account settings or email
Erasure	GDPR Art. 17 / DPDPA S.13	Submit deletion request form
Restriction	GDPR Art. 18	Email with reason
Portability	GDPR Art. 20 / DPDPA S.11(3)	Request machine-readable export
Objection	GDPR Art. 21	Email or account settings
Withdraw Consent	GDPR Art. 7(3) / DPDPA S.6(4)	In-app or email
Nominate a Person	DPDPA S.14	Via account settings

To exercise any right, contact: privacy@auraeyesolutions.com. You may be required to verify your identity before we process your request. There is no charge for exercising your rights unless requests are manifestly unfounded or excessive.

10. Data Removal Procedure

This section constitutes our formal Data Removal Procedure under GDPR Article 17 (Right to Erasure / "Right to be Forgotten") and DPDPA Section 13 (Right to Erasure).

10.1 Grounds for Erasure Request

You may request erasure where:

- Your data is no longer necessary for the original purpose of collection
- You withdraw consent and there is no overriding legal basis
- You object to processing and there are no overriding legitimate grounds
- Your data has been unlawfully processed
- Erasure is required to comply with a legal obligation

10.2 How to Submit a Removal Request

Option A — Email:

Send a request to privacy@auraeyesolutions.com with Subject: "DATA REMOVAL REQUEST"

Include: full name, registered email address, account type (individual / practitioner), and the specific data you wish removed.

Option B — In-Platform:

Navigate to Account Settings → Privacy → Request Data Deletion. Submit the form. You will receive an automated acknowledgement within 24 hours.

Option C — Postal:

Write to: Data Protection Officer, AuraEye Solutions Ltd, [Registered Address]. Include proof of identity (copy of government-issued ID).

10.3 Processing Timeline

- Acknowledgement: within 3 working days
- Identity verification completed: within 5 working days
- Full deletion executed: within 30 days of verified request
- Confirmation of deletion sent to requester: within 35 days
- Extension notice (if applicable): sent within 30 days with reason

10.4 What We Delete

Upon a valid erasure request, we will permanently delete:

- Your account credentials and profile data
- All EWJ assessment responses and results linked to your account
- Session notes, goals, and progress records
- Voice recordings stored on our servers
- Marketing preferences and consent records
- Support correspondence (subject to retention obligations below)

10.5 What We Are Required to Retain

Certain data cannot be deleted due to legal obligations:

- Financial/billing records (7 years — HMRC / UK tax law)
- Data required for active legal proceedings or regulatory investigations
- Safety-critical records where deletion could harm a third party (GDPR Art. 17(3)(b))
- Anonymised, non-identifiable analytics data (no personal link — erasure not applicable)

Where we cannot fulfil an erasure request in full, we will inform you in writing of the specific grounds, the data retained, and your right to complain to the supervisory authority.

10.6 Third-Party Deletion

Where your data has been shared with third-party processors, we will notify each processor of your erasure request and require deletion under their DPAs within the same timeframe. We will confirm third-party deletion in our completion notice.

10.7 Practitioner Client Data

If your data was collected by a licensed AuraEye practitioner, the practitioner is the independent data controller for that data. You must contact your practitioner directly to exercise erasure rights over that data. AuraEye will delete all platform-side records upon a verified request from you.

11. Data Security

AuraEye implements appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction, or alteration:

- AES-256 encryption at rest for all personal and assessment data
- TLS 1.2+ encryption for all data in transit
- Role-based access controls and least-privilege architecture
- Regular security audits and penetration testing
- Incident response procedures in compliance with GDPR Art. 33/34 (72-hour breach notification to ICO; notification to affected individuals where high risk)
- Staff training on data protection and confidentiality obligations

In the event of a personal data breach that poses a risk to your rights and freedoms, we will notify you without undue delay and no later than 72 hours after becoming aware of the breach.

12. Children's Data

The AuraEye Platform is not directed at individuals under 18 years of age. We do not knowingly collect personal data from minors. If we become aware that data has been collected from a person under 18 without verified parental consent, we will delete it immediately.

Under the DPDPA, the processing of personal data of children (under 18) requires verifiable parental consent (S.9). We implement age-verification measures at onboarding accordingly.

13. Cookies

We use cookies and similar technologies for:

- Essential operation (session management, authentication)
- Performance analytics (anonymised usage statistics)
- Marketing (only with explicit cookie consent)

You can manage cookie preferences via our Cookie Consent banner or your browser settings. Withdrawing non-essential cookie consent does not affect Platform functionality. Full details are provided in our Cookie Policy [\[link\]](#).

14. Complaints & Supervisory Authority

If you believe we have not handled your personal data in accordance with this Policy or applicable law, you have the right to lodge a complaint with the relevant supervisory authority:

UK / EU Users

Authority: Information Commissioner's Office (ICO)

Website: ico.org.uk

Telephone: 0303 123 1113

India Users

Authority: Data Protection Board of India

Website: dpboard.gov.in (when operational)

Interim Contact: Ministry of Electronics and Information Technology (MeitY)

We encourage you to contact us directly first at privacy@auraeyesolutions.com before escalating to a supervisory authority. We aim to resolve all privacy concerns promptly and fairly.

15. Changes to This Policy

We may update this Policy from time to time. Material changes will be communicated via email to registered users and a prominent notice on the Platform. The "Last Reviewed" date at the top of this document will be updated accordingly.

Continued use of the Platform after the effective date of a revised Policy constitutes acceptance of the changes. If you do not accept the changes, you may delete your account and request erasure under Section 10.

16. Contact Us

Data Protection Officer AuraEye Solutions Ltd [Registered Address, England & Wales]
privacy@auraeyesolutions.com www.auraeyesolutions.com

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Compliant with UK GDPR · EU GDPR · India Digital Personal Data Protection Act 2023*