

RETINAL.INFO — LEGAL DOCUMENT

Privacy Policy.

How Retinal collects, uses and protects personal data — for the tradespeople who subscribe to our service, and for the callers who reach them through it.

DOCUMENT

Privacy Policy

VERSION

v1.0

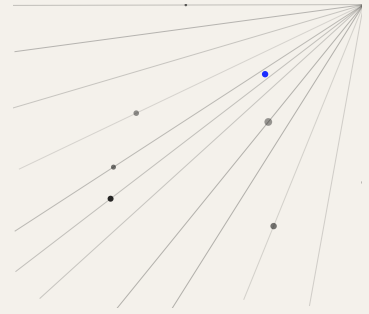
ISSUED

8 June 2026

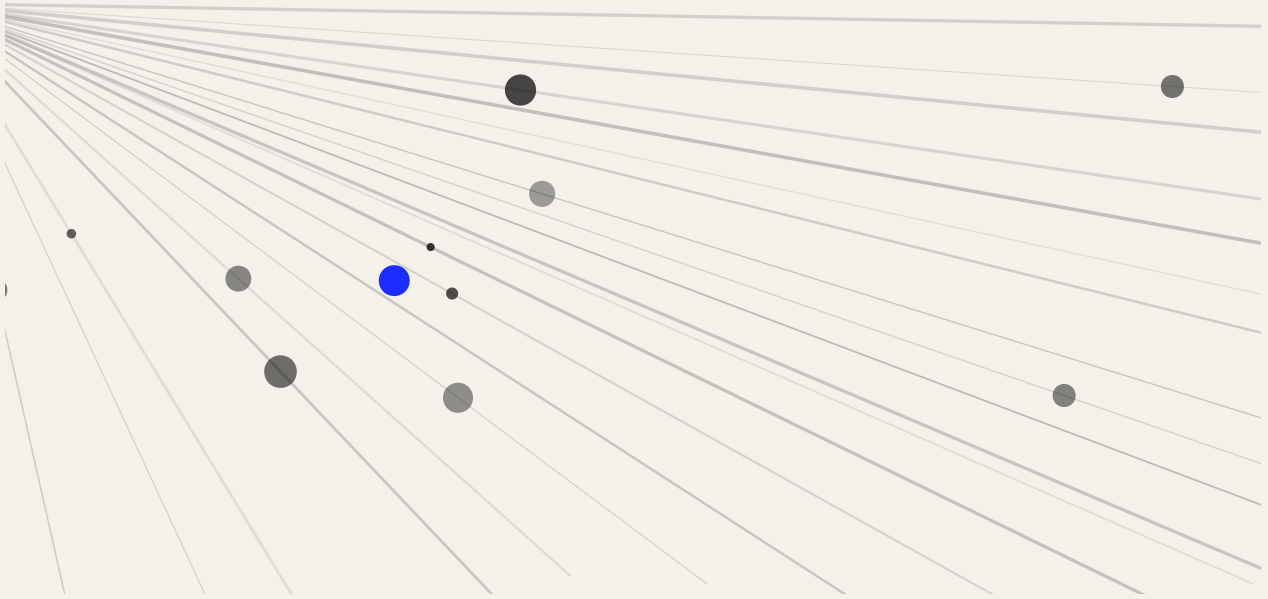
ICO REG.

ZB 891 204

Privacy Policy.



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This policy explains how Retinal handles personal data. It is written to meet the requirements of the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Privacy and Electronic Communications Regulations (PECR). Please read it alongside our Terms of Service.

01

WHO WE ARE

Who we are



Retinal is an AI receptionist service for tradespeople. We answer inbound calls that would otherwise be missed, capture the caller's details and the reason for their call, and deliver a structured summary of each call to the tradesperson.

Retinal is operated by a sole trader who is resident in the United Kingdom for tax purposes and trades under the name **Retinal** (retinal.info). We are registered with the Information Commissioner's Office (ICO) under registration number **ZB 891 204**. Contact details are in section 15.

02

SCOPE

Who this policy is for



Two different groups of people interact with Retinal, and the way we handle data is different for each. This policy covers both.

- **Clients** — the tradespeople (for example plumbers, electricians and gas engineers) who subscribe to Retinal. We hold account, contact and billing data about our clients.
- **Callers** — members of the public who telephone a tradesperson and whose call is answered by Retinal on that tradesperson's behalf. We capture the caller's details and a recording of the call.

The distinction matters because our legal role is different for each group, as explained in the next section.

Controller and processor roles



CALLER DATA — THE TRADESPERSON IS
CONTROLLER

Retinal is the Data Processor.

When Retinal answers a call on a tradesperson's behalf, the tradesperson decides why that data is collected and what happens to it. The tradesperson is therefore the **Data Controller** for the caller's personal data, and Retinal acts only as their **Data Processor** — handling that data on the tradesperson's documented instructions under a data processing agreement.

ACCOUNT & BILLING DATA — RETINAL IS
CONTROLLER

Retinal is the Data Controller.

For the personal data we hold about our own clients — the account, contact and billing information needed to provide and bill for the service — Retinal decides the purposes and means of processing and is the **Data Controller**.

In short: Retinal is the controller of its clients' account data, and the processor of the caller data those clients are responsible for. We do not use caller data for any purpose of our own beyond delivering the service and meeting our legal obligations.

Information we collect



From clients (Retinal as Controller)

- Name, business name and trading details.
- Contact details, including phone number, email address and the WhatsApp number we deliver lead summaries to.
- The knowledge document a client provides about their business, which we use to configure their assistant (this may include service areas, availability and how they want calls handled).
- Billing and payment information processed through our direct debit provider (we do not store full bank details ourselves — see section 7).
- Records of our correspondence and support requests with the client.

From callers (Retinal as Processor, on the client's behalf)

- The caller's name.
- The caller's telephone number.
- The caller's postcode or location.
- A description of the job or reason for the call.
- An audio recording of the call and a written transcript of it.
- Call metadata such as the date, time and duration of the call.

We only collect what the service needs. We do not ask callers for payment-card details, and the assistant is not designed to collect special category data. Callers should avoid sharing sensitive personal information during a call.

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LAWFUL BASIS

Why we use it, and our lawful bases



We process personal data for the following purposes and on the following lawful bases under Article 6 of the UK GDPR.

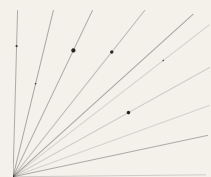
WHAT WE DO	WHOSE DATA	LAWFUL BASIS
Answering inbound calls, capturing caller details and producing lead summaries	Callers	Legitimate interests — handling inbound business calls so a tradesperson does not miss work. This basis is relied on by the tradesperson as controller; Retinal carries it out as processor.
Creating and running a client's account, configuring their assistant and providing support	Clients	Contract — performing the service contract with the client.
Taking payment and managing subscriptions	Clients	Contract , and legal obligation for tax and accounting records.
Keeping records, preventing misuse and defending legal claims	Clients & callers	Legitimate interests — running the service responsibly, and legal obligation where applicable.

Where legitimate interests are relied on for inbound call handling, the interest is the everyday business need to receive and respond to calls from prospective and existing customers. This is balanced against the caller's interests: callers are told at the start of the call that it is recorded and AI-handled, only the information needed to pass on the enquiry is captured, and the data is kept for limited periods (see section 8).

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RECORDING

Call recording and AI handling



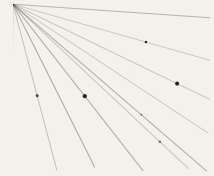
Calls answered by Retinal are **recorded** and handled by an **automated AI assistant**, not a human receptionist. At the start of each call the caller is informed that the call is being recorded and handled by an AI assistant before any details are captured.

The recording is transcribed to text so that a structured summary can be produced and sent to the tradesperson. Recordings, transcripts and the personal data within them are retained only for the periods set out in section 8. The assistant does not quote prices or confirm bookings; it captures the enquiry so the tradesperson can follow up.

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SUB-PROCESSORS

Sub-processors and international transfers



To deliver the service we use a small number of trusted technology providers (sub-processors). Each is engaged under terms that require them to protect personal data and to process it only as needed to provide their part of the service.

PROVIDER	WHAT IT DOES	WHERE DATA MAY BE PROCESSED
Twilio	Telephony — receiving and connecting calls	United States
Vapi	Voice AI orchestration that runs the assistant on a call	United States
Deepgram	Speech-to-text (transcription of recordings)	United States
Anthropic	Large language model (Claude) that understands the call and drafts the summary	United States
ElevenLabs	Text-to-speech (the assistant's voice)	United States
Vector / RAG knowledge store	Stores each client's knowledge document so the assistant can answer in context	United States / United Kingdom
GoCardless	Processing of client subscription payments	United Kingdom / European Union
WhatsApp (Meta)	Delivery of lead summaries to the client	United States

Several of these providers process data in the **United States**. Where personal data is transferred outside the UK, we rely on the UK's International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses, together with the provider's own safeguards, to keep the data protected to UK standards. We state this openly so clients and callers understand where their data goes. We do not sell personal data, and we do not share it for advertising or marketing purposes.

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RETENTION

How long we keep information



We keep personal data only for as long as it is needed, then delete it.

DATA	RETENTION PERIOD
Call recordings	30 days from the date of the call
Call transcripts and lead summaries	12 months from the date of the call
Caller personal data held for a client	Deleted within 30 days of the end of that client's contract
Client account and contact data	For the life of the account, then deleted within a reasonable period after closure
Billing and tax records	Kept as long as required by UK tax and accounting law

When a client's contract ends, the personal data we hold as their processor — including caller details and any remaining recordings or transcripts — is deleted within 30 days, unless we are required by law to keep it for longer.

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YOUR RIGHTS

Your rights



Under the UK GDPR, individuals have the following rights over their personal data:

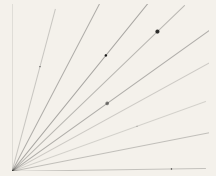
- **Access** — to be told whether we hold your data and to receive a copy of it.
- **Rectification** — to have inaccurate data corrected and incomplete data completed.
- **Erasure** — to have your data deleted in certain circumstances.
- **Restriction** — to ask us to limit how we use your data.
- **Objection** — to object to processing based on legitimate interests.
- **Portability** — to receive certain data in a portable format.
- **Rights relating to automated decision-making** — Retinal does not make decisions that produce legal or similarly significant effects about you on a solely automated basis.

Because the tradesperson is the controller of caller data, a caller who wishes to exercise rights over information captured on a call should usually contact the tradesperson they called. If you contact Retinal instead, we will pass your request to the relevant client and assist them in responding, as their processor.

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REQUESTS

How to exercise your rights



To make a request, email hish@retinal.info. We may ask for information to confirm your identity before we act. We will respond within one month, as the UK GDPR requires, and will tell you if we need longer because a request is complex. There is normally no charge.

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SECURITY

How we keep information secure



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

- Encryption of data in transit between the services we use.
- Access controls so that only the operator of Retinal can access client and caller data.
- Engaging reputable sub-processors that maintain recognised security practices.
- Limiting retention so that data is not kept longer than needed (see section 8).
- Keeping the marketing website static and minimal to reduce its attack surface.

No service can be completely secure, but we work to protect data against unauthorised access, loss or misuse.

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BREACHES

Personal data breaches

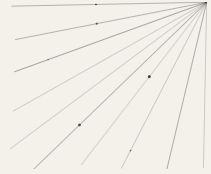


If a personal data breach occurs that is likely to result in a risk to people's rights and freedoms, we will notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware of it. Where the breach is likely to result in a high risk to individuals, we will also inform those affected. As a processor, we will notify the relevant client (controller) without undue delay after becoming aware of a breach affecting caller data so that they can meet their own obligations.

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COMPLAINTS

Complaints to the ICO

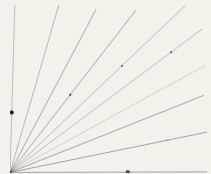


If you have a concern about how your personal data is handled, please contact us first so we can try to put it right. You also have the right to complain to the Information Commissioner's Office, the UK's data protection regulator, at ico.org.uk, by calling its helpline, or by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

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CHANGES

Changes to this policy



We may update this policy from time to time. The version number and issue date at the front of the document show when it was last changed. Where changes are significant, we will take reasonable steps to bring them to our clients' attention.

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CONTACT

Contact us



For any question about this policy or your personal data:

Retinal

Email: hish@retinal.info

Web: retinal.info

ICO registration: **ZB 891 204**

retinal.

**Never miss a job.
Built to watch when you
can't.**

Retinal · retinal.info

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