

Last updated: July 2025

DATA COLLECTION AND PURPOSE

At SOR7ED, we collect only the information necessary to facilitate tasks such as appointment scheduling or organisational support. All WhatsApp messages are encrypted, and your data is stored securely. We do not share your information without explicit permission. You may request access, correction, or deletion of your data at any time by contacting claudio@sor7ed.com.

ABOUT THIS POLICY

SOR7ED LIMITED (Company No. 16398701, ICO Registration: ZA00010319532) serves as the data controller. This policy outlines our procedures for collecting, using, and safeguarding personal data in accordance with UK GDPR.

Registered Address: 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, UK

DATA CATEGORIES COLLECTED

We limit data collection to what is essential for our concierge service:

Category	Examples
Contact Data	WhatsApp number, email address
Task Content	Task requests, documents, notes
Technical Data	Device type, IP address, browser info, cookies

USE OF PERSONAL DATA

Your information is utilised for the following purposes:

- Fulfilling task requests (e.g., research, form completion, reminders)
- Processing payments via Stripe
- Account management through Notion
- Service improvement using anonymised technical data

The legal basis for processing is either contract performance (UK GDPR Article 6(1)(b)) or, for specific activities, your consent (Article 6(1)(a)).

DATA SHARING

Data is shared exclusively with:

- Service Providers: Stripe (payments), Notion (tracking), Zapier (automation), WATI (WhatsApp interface)—all of whom comply with UK GDPR requirements.
- Legal Authorities: Where disclosure is mandated by law.

Certain data may be processed outside the UK, notably by US-based providers. We employ Standard Contractual Clauses to maintain adequate protection. Please refer to the 'International Data Transfers' section for further detail.

DATA RETENTION

Data is retained only as long as necessary:

- Contact and task data: Six months after final interaction, unless deletion is requested
- Payment data: Up to seven years, in line with statutory tax obligations
- Conversation logs: Three months for operational improvements and records
- Account details: For the duration of the account and three months thereafter

Deleted information is erased securely following industry standards.

YOUR RIGHTS UNDER UK GDPR

You are entitled to exercise the following rights:

- Access (Article 15)
- Correction (Article 16)
- Deletion (Article 17)
- Restriction of processing (Article 18)
- Objection (Article 21)
- Data portability (Article 20)

To exercise these rights, contact claudio@sor7ed.com. A response will be provided within 30 days. You may also lodge a complaint with the Information Commissioner's Office at ico.org.uk.

DATA SECURITY

We implement multiple security measures:

- End-to-end encryption for WhatsApp messaging (via WATI)
- Encrypted storage in Notion databases
- Staff confidentiality agreements
- Annual independent penetration testing
- Prompt data breach notifications (within 72 hours where required)

DATA BREACH PROCEDURES

In the event of a data breach impacting your rights or freedoms, we will:

- Notify the ICO within 72 hours
- Inform affected individuals without undue delay
- Provide relevant information regarding the breach and remediation steps
- Maintain an internal breach register

[!WARNING] WATI integration may result in additional processing by Meta. For further information, consult the WhatsApp privacy policy ([whatsapp.com/legal](https://www.whatsapp.com/legal)).

COOKIE POLICY

Types of Cookies Used

- Essential Cookies: Necessary for core website operation
- Functional Cookies: Store your preferences and configurations
- Analytical Cookies: Gather aggregated usage data (via Google Analytics)
- Third-Party Cookies: Set by partners such as Stripe, WATI, and Notion for service enablement

Cookie Duration

- Session Cookies: Temporary and deleted upon browser closure
- Persistent Cookies: Remain for a defined period (typically 30-90 days)

Managing Cookie Preferences

You can control cookie settings via:

- Your browser's settings (guidance available for Chrome, Firefox, Safari, and Edge)
- The cookie consent banner upon initial site visit
- The "Cookie Settings" link in the website footer

Disabling essential cookies may impair website functionality.

INTERNATIONAL DATA TRANSFERS

Some data may be transferred to, stored in, or processed within countries outside the UK, including the United States, Ireland, and India. To ensure ongoing protection:

- We use UK International Data Transfer Agreements (IDTAs) or the International Data Transfer Addendum to EU SCCs
- Conduct risk assessments of data protection laws in recipient jurisdictions
- Employ supplementary safeguards, including encryption and pseudonymisation
- Conduct regular audits of processors' compliance

Following Brexit, we comply with both UK GDPR and, where relevant, EU GDPR. Transfers to the EU are authorised under UK adequacy regulations.

AUTOMATED DECISION-MAKING

SOR7ED employs AI and automation to process and execute tasks efficiently:

AUTOMATED PROCESSING ACTIVITIES

- Categorisation of incoming task requests
- Automated replies to common queries
- Prioritisation and scheduling of tasks

- Sentiment analysis to identify urgent issues

PROFILING

We do not conduct automated profiling that yields legal or similarly significant outcomes.

HUMAN OVERSIGHT

Human review of any automated decision may be requested by:

- Typing “#HUMAN” within any WhatsApp conversation
- Emailing claudio@sor7ed.com
- Stating a preference for human review during interactions

Our AI employs natural language processing to interpret requests, but all decisions regarding execution, pricing, and prioritisation undergo team member review.

CHILDREN’S PRIVACY

SOR7ED’s services are not intended for individuals under 16 years of age. We do not knowingly collect data from children. If such data is inadvertently collected:

- Processing will cease immediately
- Data will be deleted within 14 days
- We will notify parents or guardians if contact information exists

Where services are accessed by persons under 16, verifiable parental consent is always required.

CONTACT INFORMATION

For queries or data protection requests, please contact:

Data Protection Officer

Email: claudio@sor7ed.com

Address: SOR7ED LIMITED, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, UK

POLICY UPDATES

This policy may be revised as our services evolve. Please refer to our website (sor7ed.com) for the most current version.