

Optimised AI Limited

Data Governance Policy

Policies covering data collection, usage, storage, and deletion, with specific attention to personally identifiable information.

Document Owner	Optimised AI Limited — Board of Directors
Trading Name	GetFrugal (www.getfrugal.uk)
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Review Cycle	Annual (or upon material change to AI systems)

1. Purpose and Scope

This policy establishes the data governance framework for Optimised AI Limited, trading as GetFrugal (www.getfrugal.uk). It defines how we collect, process, store, and delete data across our AI-powered spending analysis platform. This policy applies to all employees, contractors, and third-party processors who handle data on behalf of GetFrugal.

GetFrugal is registered with the Information Commissioner's Office (ICO) under registration number ZC085486 and operates in full compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Service Overview

GetFrugal provides an AI-powered platform that helps UK consumers optimise their spending. Users upload bank statements or transaction data, and our proprietary AI analyses this information to identify savings opportunities, unnecessary subscriptions, cashback possibilities, and unclaimed rewards. The service operates on a subscription basis at £29.99 per month.

3. Data Classification

All data processed by GetFrugal is classified into the following categories:

3.1 Personal Data (Standard)

- Full name and email address (used for account creation and communications)
- Contact details provided during registration
- Account preferences and notification settings

3.2 Financial Transaction Data

- Bank statement data uploaded by the user (transaction descriptions, dates, amounts)
- Categorised spending patterns generated by our AI analysis
- Savings recommendations and identified subscription data

Important: GetFrugal does not store full bank account numbers, sort codes, or banking credentials. We process transaction-level data only.

3.3 Payment Data

- Subscription payment details are handled entirely by our PCI-DSS compliant payment processor
- GetFrugal does not store card numbers, CVVs, or full payment credentials on its own systems

3.4 Technical Data

- IP addresses, browser type, device identifiers (for security and fraud prevention)

- Session logs and usage analytics (anonymised where possible)

4. Data Collection Principles

All data collection adheres to the UK GDPR principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, and confidentiality. Specifically:

- **We collect only the data strictly necessary to deliver our spending analysis service. We do not harvest or aggregate data beyond what the user provides for analysis.**Data Minimisation:
- **Users actively upload their transaction data and consent to its processing during the onboarding flow. No data is collected passively or without clear user action.**Explicit Consent:
- **Transaction data is used solely for generating personalised savings insights. It is never sold, shared with advertisers, or used for purposes outside the agreed service scope.**Purpose Limitation:
- **Processing is carried out under Article 6(1)(b) UK GDPR (performance of a contract) for the core service, and Article 6(1)(a) (consent) for any optional communications.**Lawful Basis:

5. Data Storage and Security

5.1 Infrastructure

All data is hosted on DigitalOcean cloud infrastructure with the following security measures in place:

- All data encrypted at rest using AES-256 encryption
- All data encrypted in transit using TLS 1.2 or higher
- Infrastructure hosted in data centres with SOC 2 Type II and ISO 27001 certifications
- Network-level firewalls and intrusion detection systems
- Regular automated backups with encrypted storage

5.2 Access Controls

- Role-based access control (RBAC) ensures only authorised personnel can access user data
- Multi-factor authentication (MFA) required for all administrative access
- Access logs are maintained and reviewed regularly
- Principle of least privilege applied across all systems

5.3 AI Model Data Isolation

Our proprietary AI model processes transaction data in isolated environments. User data is never used to train or improve AI models without explicit, separate consent. Each user's data is logically segregated and cannot be accessed by other users or mixed into aggregate model training datasets.

6. Data Retention and Deletion

We apply the following retention schedule:

Data Type	Retention Period	Deletion Method
Uploaded bank statements	Processed and deleted within 30 days of analysis completion	Secure erasure from all storage
Spending analysis results	Retained for the duration of active subscription + 30 days	Automated deletion upon account closure
Account/profile data	Retained for duration of subscription + 90 days	Full account purge on request or after grace period
Technical/security logs	12 months maximum	Automated rotation and secure deletion

6.1 Right to Erasure

Users may request deletion of their data at any time via the account settings opt-out page (my.getfrugal.uk/opt-out) or by contacting us directly. Upon receiving a valid erasure request, all personal and transaction data will be permanently deleted within 30 days, except where retention is required by law (e.g., financial record-keeping obligations).

7. Data Subject Rights

In accordance with UK GDPR, all users have the right to: access their personal data (Article 15); rectification of inaccurate data (Article 16); erasure of their data (Article 17); restrict processing (Article 18); data portability (Article 20); and to object to processing (Article 21). Requests are handled within 30 days and can be submitted via our contact page or to our registered office.

8. Data Breach Procedures

In the event of a personal data breach, GetFrugal will: assess the nature and scope of the breach within 24 hours; notify the ICO within 72 hours where the breach poses a risk to individuals' rights and freedoms, as required under Article 33 UK GDPR; notify affected users without undue delay where there is a high risk to their rights; document all breaches, including those not requiring notification, in an internal breach register; and conduct a post-incident review and implement measures to prevent recurrence.

9. Third-Party Data Processing

Where third-party processors are engaged (e.g., payment processing), GetFrugal ensures that appropriate data processing agreements (DPAs) are in place in accordance with Article 28 UK GDPR. All processors must demonstrate equivalent security standards and are subject to regular compliance reviews. Currently, our third-party processing is limited to payment processing for subscription billing.

10. Review and Governance

This policy is reviewed annually or whenever there is a material change to the GetFrugal platform, AI systems, or data processing activities. The board of directors of Optimised AI Limited holds ultimate accountability for data governance. Day-to-day compliance is managed by the designated data protection lead.