

LLCR TECHNOLOGIES LTD

PRIVACY POLICY

For the LLCR Platform (llcr-app.uk) and LLCR Marketing Website (llcr.uk)

Last updated: 20 April 2026

1. WHO WE ARE

1.1 This Privacy Policy explains how LLCR Technologies Ltd ("LLCR", "we", "us", or "our") collects, uses, stores, and shares your personal data when you use our Platform and visit our website.

1.2 LLCR Technologies Ltd is the data controller for the personal data described in this Policy. This means we decide why and how your personal data is processed.

1.3 Our details:

Full company name: LLCR Technologies Ltd

Company number: 17167813 (registered in England and Wales)

Registered office: 28 Beaufort Court Admirals Way, London, United Kingdom, E14 9XL

ICO registration number: ZC128424

Email: privacy@llcr.uk

1.4 We have not appointed a Data Protection Officer (DPO) as we are not required to do so under Article 37 of the UK GDPR. If you have any questions about this Policy or our data practices, please contact us at privacy@llcr.uk.

2. WHAT THIS POLICY COVERS

2.1 This Policy applies to personal data we collect when you:

- (a) visit our marketing website at llcr.uk;
- (b) create an account and use our Platform at llcr-app.uk;
- (c) subscribe to a paid Plan;
- (d) contact us by email or through the Platform; or
- (e) interact with our AI assistant, Ava.

2.2 This Policy does not cover third-party websites or services linked from our Platform. We encourage you to read the privacy policies of those third parties before providing them with your personal data.

3. THE PERSONAL DATA WE COLLECT

We collect the following categories of personal data:

Category	Data collected	Source
Account data	Full name, email address, password (hashed), account preferences	Provided by you at registration
Property data	Property addresses, tenancy details (type, start date), jurisdiction	Provided by you via the Platform

Tenant data	Tenant names, addresses, contact details (where you choose to enter them)	Provided by you via the Platform (see clause 8)
Certificate data	Certificate types, issue dates, expiry dates, issuer names, file uploads	Provided by you via the Platform
Payment data	Billing email, last four digits of card, payment history, subscription status	Stripe (our payment processor). We never see or store your full card number.
Usage data	Pages visited, features used, session duration, timestamps, device type, browser type	Collected automatically via cookies and server logs
Communications	Messages to Ava (AI assistant), emails to support, feedback	Provided by you when you communicate with us
Technical data	IP address, browser type and version, operating system, referral URL	Collected automatically when you access the Platform
Document Builder data	Information entered into forms (landlord name, tenant name, property address, ground for possession, rent amounts)	Provided by you when generating documents

3.1 We do not collect any special category data (such as racial or ethnic origin, political opinions, religious beliefs, health data, or biometric data) unless you voluntarily include it in free-text fields. We strongly discourage this.

3.2 We do not knowingly collect personal data from anyone under the age of 18. The Service is intended for adult landlords only.

4. HOW AND WHY WE USE YOUR PERSONAL DATA

The UK GDPR requires us to have a lawful basis for each way we use your personal data. The table below sets out our purposes for processing, the lawful basis we rely on, and the categories of data involved.

Purpose	Lawful basis (UK GDPR Art. 6)	Data used
Creating and managing your account	Performance of a contract (Art. 6(1)(b))	Account data, technical data
Providing the Service (property tracking, certificate management, compliance reminders)	Performance of a contract (Art. 6(1)(b))	Account data, property data, certificate data
Processing payments and managing subscriptions	Performance of a contract (Art. 6(1)(b))	Account data, payment data
Generating documents via the Document Builder	Performance of a contract (Art. 6(1)(b))	Document Builder data, property data, tenant data
Operating the AI assistant (Ava)	Performance of a contract (Art. 6(1)(b))	Communications, property data, certificate data

Sending transactional emails (confirmations, expiry reminders, password resets)	Performance of a contract (Art. 6(1)(b))	Account data
Sending optional Telegram alerts	Consent (Art. 6(1)(a)) — you opt in explicitly	Account data, property data
Improving the Service, fixing bugs, analysing usage patterns	Legitimate interests (Art. 6(1)(f)) — our interest in improving the product	Usage data, technical data
Preventing fraud, enforcing our Terms, protecting security	Legitimate interests (Art. 6(1)(f)) — our interest in keeping the Service secure	Account data, technical data, usage data
Complying with legal obligations (e.g. tax records, responding to law enforcement)	Legal obligation (Art. 6(1)(c))	Account data, payment data
Responding to your enquiries and providing support	Legitimate interests (Art. 6(1)(f)) — our interest in providing good customer service	Account data, communications

4.1 Where we rely on legitimate interests, we have carried out a balancing test to ensure our interests do not override your fundamental rights and freedoms. You can ask us for details of this balancing test by contacting privacy@llcr.uk.

4.2 Where we rely on your consent, you may withdraw it at any time by contacting us or changing your settings in the Platform. Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

5. WHO WE SHARE YOUR DATA WITH

5.1 We do not sell your personal data to anyone. We never have and we never will.

5.2 We share your personal data only with the following categories of recipients, and only to the extent necessary to provide the Service:

Recipient	Purpose	Data shared	Location & safeguards
Supabase (database & auth)	Hosting your data, authenticating your account	All Platform data	EU (AWS Frankfurt). UK adequacy decision applies to EU.
Vercel (hosting)	Serving the web application	Technical data, IP address	US. UK-US Data Bridge / International Data Transfer Agreement (IDTA).
Stripe (payments)	Processing subscription payments	Payment data, email	US. UK-US Data Bridge / Standard Contractual Clauses.
Anthropic (AI)	Powering Ava, our AI assistant	Messages to Ava, portfolio summary data	US. Standard Contractual Clauses (UK Addendum). Anthropic does not use your data to train models.

Resend (email)	Sending transactional emails	Email address, name	US. UK-US Data Bridge / Standard Contractual Clauses.
Telegram (optional)	Sending compliance alerts (if you opt in)	Telegram user ID, property alerts	Global. You control this by opting in. Telegram's privacy policy applies.

5.3 We may also disclose your personal data if required to do so by law, regulation, legal process, or governmental request, or if we believe disclosure is necessary to protect our rights, your safety, or the safety of others.

5.4 If LLCR is acquired, merges with another company, or sells substantially all of its assets, your personal data may be transferred to the successor entity. We will notify you of any such transfer and any choices you may have regarding your data.

6. INTERNATIONAL DATA TRANSFERS

6.1 Some of our third-party service providers are based in the United States. When we transfer your personal data outside the United Kingdom, we ensure that appropriate safeguards are in place as required by Chapter V of the UK GDPR.

6.2 The safeguards we rely on include:

- (a) the UK-US Data Bridge (an extension of the EU-US Data Privacy Framework), for US providers who are certified under it;
- (b) the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses, where the Data Bridge does not apply; and
- (c) UK adequacy decisions, where the destination country has been assessed by the UK Government as providing an adequate level of data protection (this covers transfers to the EU/EEA).

6.3 You may request a copy of the relevant safeguards by contacting us at privacy@llcr.uk.

7. HOW LONG WE KEEP YOUR DATA

We do not keep your personal data for longer than necessary. The specific retention periods are:

Data type	Retention period	Reason
Account data	Duration of your account, plus 30 days after closure	To allow you to reactivate and to handle any post-closure queries
Property and certificate data	Duration of your account, plus 30 days after closure	Core Service data; deleted after the post-closure grace period
Payment records	6 years after the transaction	HMRC requirement under the Income Tax (Trading and Other Income) Act 2005 and the Limitation Act 1980

Ava conversation logs	90 days from the date of the conversation	To support debugging and Service improvement; then permanently deleted
Support emails	2 years from the date of the last communication	To maintain context for recurring issues
Usage and technical data (analytics)	12 months from collection	To analyse trends and improve the Service
Terms acceptance audit log	6 years after account closure	To evidence acceptance of contractual terms in the event of a dispute (Limitation Act 1980)

7.1 When a retention period expires, we securely delete or anonymise the data so that it can no longer be linked to you.

8. TENANT DATA — YOUR RESPONSIBILITIES AS A DATA CONTROLLER

8.1 When you enter personal data about your tenants into the Platform (such as their names, addresses, and contact details), you are acting as a data controller for that data within the meaning of the UK GDPR. We act as a data processor on your behalf.

8.2 As a data controller, you are responsible for:

- (a) having a lawful basis (such as legitimate interests or performance of a contract) for entering your tenants' personal data into the Platform;
- (b) informing your tenants about how their data is processed, including that you use LLCR as a data processor; and
- (c) responding to any data subject access requests from your tenants.

8.3 We will assist you in responding to data subject requests to the extent that the relevant data is within our systems, and we will notify you without undue delay if we receive a request directly from one of your tenants.

8.4 We process tenant data only on your documented instructions (which are given by your use of the Platform) and in accordance with our obligations as a data processor under Article 28 of the UK GDPR.

8.5 If you require a formal Data Processing Agreement (DPA), please contact us at privacy@llcr.uk and we will provide one.

9. AI ASSISTANT (AVA) — HOW YOUR DATA IS USED

9.1 Ava is powered by Anthropic's Claude language model. When you send a message to Ava, we transmit the following to Anthropic's API:

- (a) your message;
- (b) recent conversation history (up to the last 8 messages in the session); and
- (c) a summary of your property portfolio (property names, compliance status, and certificate expiry dates) so Ava can give you relevant answers.

9.2 Anthropic processes this data solely to generate a response to your message. Anthropic does not use your data to train its models. Anthropic's data handling is governed by its API terms and its data retention policies, which you can review at anthropic.com.

9.3 We do not send Anthropic your payment data, your password, or your tenants' personal contact details.

9.4 Ava conversations are stored on our systems for up to 90 days for debugging and Service improvement purposes, after which they are permanently deleted.

10. COOKIES

10.1 Our Cookie Policy is set out in a separate document available at llcr.uk/cookies. It explains what cookies we use, why we use them, and how you can manage your preferences.

10.2 In summary, we use:

- (a) strictly necessary cookies for authentication and session management (these cannot be disabled);
- (b) analytics cookies (subject to your consent) to help us understand how the Platform is used; and
- (c) preference cookies to remember your settings (such as dark mode).

10.3 We do not use advertising or tracking cookies. We do not share cookie data with advertisers.

11. YOUR RIGHTS UNDER THE UK GDPR

Under the UK GDPR, you have the following rights in relation to your personal data. These rights are not absolute and may be subject to exemptions.

Right	What this means
Right of access	You can ask us for a copy of the personal data we hold about you (a "Subject Access Request"). We will respond within one month.
Right to rectification	You can ask us to correct any personal data that is inaccurate or incomplete. You can also update most of your data directly through the Platform.
Right to erasure	You can ask us to delete your personal data. We will do so unless we have a legal obligation to retain it (e.g. payment records for HMRC).
Right to restrict processing	You can ask us to temporarily stop processing your data in certain circumstances (for example, while we verify its accuracy).
Right to data portability	You can ask us to provide your personal data in a structured, commonly used, machine-readable format so you can transfer it to another provider.
Right to object	You can object to processing based on legitimate interests. We will stop processing unless we can demonstrate compelling grounds that override your interests.
Right to withdraw consent	Where processing is based on your consent (e.g. analytics cookies, Telegram alerts), you can withdraw consent at any time.
Right to complain	You have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk or by calling 0303 123 1113.

11.1 To exercise any of these rights, please email us at privacy@llcr.uk. We will respond within one month. If your request is complex, we may extend this by a further two months, but we will tell you within the first month if this is the case.

11.2 We will not charge you a fee to exercise your rights, except in cases where your request is manifestly unfounded or excessive, in which case we may charge a reasonable fee or refuse the request.

11.3 We may need to verify your identity before acting on a request.

12. DATA SECURITY

12.1 We take the security of your data seriously. We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, destruction, or alteration. These include:

- (a) encryption of data in transit (TLS/HTTPS) and at rest;
- (b) access controls using role-based permissions;
- (c) secure password hashing (bcrypt via Supabase Auth);
- (d) regular security reviews of our codebase;
- (e) use of reputable, certified third-party infrastructure providers (Supabase, Vercel, Stripe); and
- (f) workspace isolation, so that each user can only access their own data.

12.2 No system is completely secure. While we take reasonable precautions, we cannot guarantee the absolute security of your data. If we become aware of a data breach that poses a risk to your rights and freedoms, we will notify you and the ICO without undue delay, and in any event within 72 hours, in accordance with Article 33 of the UK GDPR.

13. AUTOMATED DECISION-MAKING AND PROFILING

13.1 We do not use your personal data for automated decision-making that produces legal effects or similarly significant effects on you.

13.2 Ava (our AI assistant) provides informational responses based on your queries and property data. Ava does not make decisions about your access to the Service, your subscription, or your legal rights. You are always in control of any actions you take based on Ava's responses.

13.3 Compliance scores and traffic-light indicators displayed on the Platform are calculated algorithmically based on your certificate expiry dates. These are informational tools to help you manage your portfolio, not automated decisions. They do not have legal or contractual effects.

14. CHANGES TO THIS POLICY

14.1 We may update this Policy from time to time to reflect changes in our data practices, legal requirements, or the Service itself.

14.2 If we make material changes, we will notify you by email at least 14 days before the changes take effect. We will also update the "Last updated" date at the top of this Policy.

14.3 We encourage you to review this Policy periodically.

15. HOW TO CONTACT US

15.1 If you have any questions about this Privacy Policy, wish to exercise your data rights, or have a concern about how we handle your data, please contact us:

Email: privacy@llcr.uk

Post: LLCR Technologies Ltd, 28 Beaufort Court Admirals Way, London, E14 9XL

15.2 If you are not satisfied with our response, you have the right to complain to the Information Commissioner's Office (ICO):

Website: ico.org.uk

Telephone: 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF