

Version: 2.0

Release Date: 22 September 2026

1. Who We Are

Cascader Ltd (Company No. 16399605, 3rd Floor, 86–90 Paul Street, London, EC2A 4NE) ("we", "us", "our") is a UK-based developer of Software as a Medical Device (SaMD). For the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, Cascader Ltd acts as the Data Controller for the personal data described in this notice.

Data Protection Officer (DPO):	Dr. Henry David Jeffry Kelly
Governance & Privacy Contact:	data.protection@cascader.ai
General Inquiries:	info@cascader.ai

2. Scope of This Privacy Notice

This Master Privacy Notice applies to personal data collected across all Cascader Ltd contact points, structured into four main operational areas:

1. Website Visitors & Enquiries: Individuals contacting us via our website forms or general email addresses.
2. Business Contacts & Collaborators (B2B): Healthcare professionals, academic partners, clinicians, vendors, and prospective commercial partners corresponding with us or managed within our relationship databases.
3. User Research & Usability Testing Participants: Individuals participating in software evaluations, human factors testing (ISO 62366-1), workshops, interviews, and clinical feedback sessions.
4. Patient & Public Involvement (PPI) Panels: Members of the public, patients, and caregivers subscribing to our research updates or volunteer feedback panels.

3. What Personal Data We Collect

Depending on how you interact with us, we collect and process the following categories of information:

Website Enquiries: Name, email address, message content, and optional web performance cookies.

Business & Professional Contacts: Name, work email address, job title, healthcare organization/affiliation, telephone number, meeting notes, and email correspondence history managed via enterprise relationship tools.

User Research Data:

- *Contact & Identity Data*: Name, work/personal email address, role, and professional background.

- *Audio/Visual (AV) Recordings*: Screen recordings, audio tracks, and video footage captured during virtual or in-person research sessions.
- *Qualitative Insights & Feedback*: Usability feedback, workflow observations, and (where voluntarily disclosed) lived health experiences or clinical perspectives.

Special Category Data: Voluntary disclosures of personal health conditions, clinical experiences, or healthcare background made during qualitative research sessions.

Participation in user research is entirely voluntary. Providing necessary contact details is required to join a session; all other disclosures (including health-related information) are optional. Refusing to provide identifiable information required for the research activity means we cannot include you in the activity.

4. Our Lawful Basis for Processing

Processing Activity	Lawful Basis under UK GDPR	Details & Safeguards
Website Form & General Enquiries	Legitimate Interests (Art. 6(1)(f))	Processing is necessary to respond to user enquiries, manage follow-ups, and maintain business operations.
B2B Correspondence & Relationship Management	Legitimate Interests (Art. 6(1)(f))	Necessary for routine business communications, managing partner relationships, and maintaining contact logs in our Customer Relations Management system (Attio).
User Research & Usability Engineering (Standard Data)	Legitimate Interests (Art. 6(1)(f))	Necessary to conduct medical device software development, human factors testing (ISO 62366-1), and product safety evaluations.
User Research (Special Category Health Data)	Scientific / Research Purposes (Art.	Satisfies DPA 2018 Schedule 1, Part 1, Para 4 (Research in the public interest). Governed by our

	9(2)(j) & DPA 2018 Sch. 1)	Appropriate Policy Document (APD001).
Healthcare Professional Re-engagement (B2B)	Legitimate Interests (Art. 6(1)(f))	Retaining work contact details of clinicians to share future relevant research opportunities, operating within UK Privacy and Electronic Communications Regulations (PECR) corporate subscriber norms.
Patient & Public Involvement (PPI) Panels (B2C)	Consent (Art. 6(1)(a))	Explicit opt-in consent collected via registration forms to invite individuals to future PPI activities.

Note: We do not perform solely automated decision-making or profiling that produces legal or similarly significant effects. Any AI-assisted qualitative transcript analysis is subject to mandatory human review.

5. Data Storage, Sub-processors, and International Transfers

All core workspace data, customer records, and research assets are stored in encrypted cloud repositories.

Primary Storage: Hosted within UK/EEA data center regions (Google Cloud Platform, Attio CRM, Miro).

Enterprise Processors: We use vetted third-party service providers acting strictly on our documented instructions:

- *Google Workspace / GCP:* Enterprise cloud hosting, email infrastructure, and document storage.
- *Attio Ltd:* Customer Relationship Management (CRM) and contact pipeline management.
- *Miro:* Collaborative virtual whiteboards for interactive workshops.

International Transfers & AI Sub-processors: Core workspace data remains in the UK/EEA. Where optional AI features or cloud tools process data outside the UK/EEA (such as US-based LLM sub-processors Anthropic or OpenAI), transfers are governed by approved transfer mechanisms, including EU Standard Contractual Clauses (SCCs) and the UK International Data Transfer Addendum. Commercial enterprise contracts strictly prohibit third-party sub-processors from using our data payloads to train public AI models.

6. Retention & Deletion Schedules

Website Enquiries: Retained for 6 months from submission date, unless the enquiry leads to an ongoing business or research relationship.

Routine B2B Contacts & CRM Records: Retained for the duration of the professional relationship plus up to 5 years from last active engagement.

Raw Audio/Video Recordings: Retained only for as long as necessary to complete qualitative analysis and transcription (up to a maximum of 12 months from the session date), after which raw media files are permanently deleted.

Transcripts & De-identified Research Insights: Written transcripts are de-identified.

Aggregated research findings are retained throughout the active product lifecycle to maintain medical device technical documentation and regulatory auditability (e.g., MHRA/UKCA compliance).

Suppression List Records: If you [request to unsubscribe](#) or object to communications, your email address is retained on a restricted central suppression list indefinitely to ensure automated outreach systems filter out and exclude your address in the future.

7. Your Data Protection Rights

Under UK GDPR and Data (Use and Access) Act 2025, you have the right to access, rectify, or request erasure of your personal data. You also have the right to restrict or object to our processing of your data, and the right to receive your data in a portable, machine-readable format. To exercise any of these rights or lodge a complaint directly with us please contact us at data.protection@cascader.ai. We will acknowledge your email within 14 days and respond within one month as required by UK GDPR.

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk or by post to Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF (Helpline: 0303 123 1113, Website: ico.org.uk/make-a-complaint). Where research data has been fully anonymised or incorporated into aggregated clinical findings, erasure may not be technically or legally possible.