

Data & AI Summary

One-page reference for compliance and decision-makers.

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Topic	Position
Roles	You are Controller. CaseFlow Automation Ltd is Processor under a signed DPA.
Registration	ICO ZC013423. CaseFlow Automation Ltd, 7-9 Macon Court, Crewe, CW1 6EA.
AI provider	Google Gemini via Lovable AI gateway. No retention. No training on your data.
What goes to AI	Redacted engineer report text. Image-only PDF fallback is logged per case.
PII redaction	Names, VRM, postcode, email, phone, NINO, UK driving licence, IBAN and card number replaced with placeholders. Restored locally on return.
Storage	Encrypted at rest and in transit. Hosted in the EEA (AWS eu-central-1, Frankfurt). Row-level access controls per organisation. UK-EEA transfers covered by UK GDPR adequacy.
Retention	Automatic minimisation. Personal data scrubbed the moment a settlement completes. Abandoned cases anonymised at 30 days, operator warned 7 days before. Anonymised settlement statistics retained for reporting. Every purge audited. No standing library of claimant data.
Customer access	Unique link verified by registration and postcode. Link is live while the case is open and disabled when the case completes or expires.
Offboarding	Whole-organisation data wipe on exit, subject to legal hold.
Human oversight	Handler reviews AI extraction and summary before customer issue. AI does not make final settlement decisions.
Audit	Every handler and customer action is logged with timestamp and user identity. PII purges have their own audit trail with an automated weekly health check.
Available on request	Signed DPA, sub-processor list, DPIA, security questionnaire.

Full position is published at totalsettle.com/ai-data-handling. Signed DPA on request.

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TotalSettle policy pack and is provided for information. It does not constitute legal advice. For the signed DPA, sub-processor list, or DPIA, contact info@caseflowautomation.co.uk.