

# TP Safety Services Ltd

## Privacy Policy

This policy was last updated on 9 September 2026.

### This policy at a glance

- We are TP Safety Services Ltd, registered with the ICO under reference ZB700710.
- Two of our three products never send your data anywhere. They run entirely on your own device.
- Our one paid AI feature sends only what you choose to submit to Google's Gemini API, under a contract that stops Google using it to train its models.
- We do not sell your data, run advertising, or share your information beyond what this policy describes.
- If you attend one of our accredited training courses, we keep your training record for three and a half years, then securely dispose of it.

### Who we are

TP Safety Services Ltd provides the CRISP Pulse product suite, including The System, Personal Audit, and Deep Read, and also delivers accredited training courses. We are the data controller for the personal data described in this policy, except where stated otherwise. We are registered with the UK Information Commissioner's Office under reference ZB700710.

### Cookies and similar technologies

Our website uses essential cookies to keep you signed in and to remember your session while you use our membership area. These cookies are necessary for the site to function and do not track you for advertising purposes.

CRISP Pulse Deep Read additionally uses your browser's local storage, rather than cookies, to save your glossary terms and analysis history, as described below.

### CRISP Pulse The System, organisational survey

Survey responses are collected anonymously. We do not require sign in to take a survey, we do not collect free text answers, and individual responses cannot be linked to a named person by us or by the organisation administering the survey. Organisations see only aggregate results at group level.

The only identifying element we hold is the organisation tag chosen at registration. We use this solely to keep one organisation's aggregate results separate from another's. Survey responses, together with this organisation tag, are stored in our database, provided by Supabase. No name, email address, or other personal identifier is stored alongside a response.

### CRISP Pulse Personal Audit

Personal Audit runs entirely on your own device. We do not collect, receive, or store your answers or results, and we have no way to see them. The only way we would ever see your results is if you choose

to share them with us directly, for example by printing your report and sending it to us, or reading out your numbers. That choice is entirely yours and happens outside the product itself.

## **CRISP Pulse Deep Read, Pattern analysis**

Pattern analysis runs entirely in your browser. Transcript content is never sent to us or to any third party. Glossary terms and analysis history are stored only in your own browser's local storage, on your own device, and you can clear them at any time.

## **CRISP Pulse Deep Read AI (paid)**

If you use Deep Read AI, your transcript content and any meeting metadata you enter is sent to Google's Gemini API, using our paid tier account, to generate the analysis. Under Google's terms for paid services, your content is not used to train Google's models. Google processes this data as our sub processor under a Data Processing Addendum.

**Before using this feature, please remove confidential information and avoid including specific health or medical details about named individuals wherever possible.** You are responsible for having an appropriate basis to include other people's words or names in what you submit.

## **Accredited training courses**

In addition to the CRISP Pulse product suite, TP Safety Services Ltd delivers accredited training courses through NUCO Training, certified by the FAA. If you attend one of our training courses, we keep a training record covering your attendance and results.

We keep training records for three and a half years after your course. This allows us to meet the record keeping requirements of our accrediting bodies and to provide evidence of your certification if you or your employer needs it during that period. After three and a half years, we securely dispose of these records.

Our lawful basis for keeping training records is our legitimate interest in meeting our obligations as an accredited training provider, alongside the contract we enter into to deliver your course.

## **Payments**

Payments for our paid subscriptions are processed by Stripe. We do not receive or store your full card details. Stripe processes this information under its own privacy policy and security standards, and acts as an independent controller for payment processing.

## **Organisations that help us provide our service**

We use a small number of other organisations to help us run CRISP Pulse and TP Safety Services. Our website is hosted by IONOS. Payments are processed by Stripe. Deep Read AI analysis is processed by Google, as described above. Survey response data for The System is stored using Supabase, our database provider. Each organisation only receives the information needed to perform its specific role, and none are permitted to use your data for their own purposes beyond that.

## Automated decision making

CRISP Pulse produces scores and suggestions to help you understand and improve communication. These are informational signals, not automated decisions. No CRISP Pulse product makes decisions about you that produce legal effects or similarly significant effects. Any decisions based on the results, such as performance conversations, remain entirely a matter for you and your organisation, not for us or for CRISP Pulse.

## Our legal basis for processing, Deep Read AI

Our lawful basis for processing personal data through Deep Read AI is legitimate interests. Providing you with a communication analysis tool you have chosen to use is necessary for us to run our business, and we have concluded this does not override your rights or the rights of anyone mentioned in a transcript you submit, particularly given the safeguards described throughout this policy.

## International transfers

Google processes Deep Read AI data using infrastructure that may be located outside the United Kingdom. This transfer is covered by Google's Data Processing Addendum, which incorporates recognised safeguards for moving personal data across borders. If you have questions about this, please contact us using the details below.

Survey data for The System is stored by Supabase, our database provider, on servers located within the European Union. The United Kingdom recognises the European Union as providing an adequate level of data protection, so this transfer does not require additional safeguards beyond those already in place.

## Retention

We do not store your transcript content or Deep Read AI results on our servers at any point. Your submission passes through our server only for the moment it takes to forward it to Google and return the result to your browser. It is not written to any database and is discarded immediately afterwards. Your analysis history is saved only in your own browser's local storage, on your own device, and you can clear it at any time.

The only thing our server retains is a short lived count of how many AI analyses you have run in the current hour, used solely to prevent overuse. It contains no transcript content and expires automatically. If a request to Google fails, a brief error message may be recorded in our server logs for troubleshooting purposes. This does not include your transcript content.

Google, as our sub processor, retains prompts and responses for a limited period under its own paid service terms, solely for safety, abuse detection, and legal compliance, not for training its models.

Survey responses for The System are stored in our database, hosted by Supabase, which acts as our data processor for this data under its own Data Processing Agreement. Supabase's infrastructure logs may briefly record the IP address of the device that submitted a response; these logs are unrelated to survey content and are retained for a short period, currently one day, before being automatically deleted.

We keep survey response data for as long as an organisation continues to use The System, so that it can track how its results change over time. We do not apply a fixed deletion schedule while that relationship continues, as this ongoing record is what makes trend tracking possible. If an organisation

stops using The System, or asks us to delete its data sooner, we will remove it from our database on request, using the contact details below.

## How we protect your data

We use encryption for all data in transit, require login before any AI analysis can be run, and verify every request using a security token to prevent unauthorised access. Access keys for our AI service are stored only in secure server configuration and never appear in code that could be exposed.

Survey data for The System is protected in the same way by Supabase, which encrypts data at rest and in transit and maintains its own access controls and backups as part of its Data Processing Agreement with us.

## Other people mentioned in your transcripts

If someone believes their information has been processed through Deep Read AI and wants to know more, or wants it removed, they can contact us using the details below. We will respond within 30 days.

## Your rights

Under UK data protection law, you have the following rights.

- The right to be informed about how your data is used, which this policy sets out
- The right to access the personal data we hold about you
- The right to have inaccurate data corrected
- The right to have your data erased in certain circumstances
- The right to restrict how we use your data in certain circumstances
- The right to receive your data in a portable format where relevant
- The right to object to processing based on legitimate interests
- Rights related to automated decision making, though as set out above, we do not use automated decision making that has legal or similarly significant effects on you

We will respond to any request within 30 days, in line with the standard response period under UK data protection law. To exercise any of these rights, contact us using the details below.

You also have the right to complain to the Information Commissioner's Office at [ico.org.uk](https://ico.org.uk) if you believe your data has been mishandled.

## Our data protection contact

As a small business, we are not required to appoint a formal Data Protection Officer. Tim Pollard is our nominated contact for all data protection matters and can be reached using the details below.

## If something goes wrong

If we become aware of a personal data breach that is likely to result in a risk to your rights and freedoms, we will assess it promptly and, where required, notify the Information Commissioner's Office within 72 hours and inform affected individuals without undue delay.

## Other websites

Our website may contain links to other websites. This policy only covers TP Safety Services and CRISP Pulse. We are not responsible for the privacy practices of other websites, and we encourage you to read their privacy policies when you visit them.

## Children

CRISP Pulse is a business tool intended for use by adults in a professional capacity. It is not directed at children, and we do not knowingly collect data from anyone under 18.

## Changes to this policy

We may update this policy from time to time. The date at the top shows when it was last revised. Significant changes will be reflected here before they take effect.

## Contact

TP Safety Services Ltd

[timpollard@tpsafety.co.uk](mailto:timpollard@tpsafety.co.uk)

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