



Privacy Policy

OBSIDIAN TECHNOLOGIES LIMITED

Last updated: 12 February 2026

Privacy Policy

Last updated: 12 February 2026

Obsidian Technologies Limited ("Obsidian," "We," "Us," or "Our") respects your privacy and is committed to protecting your personal data. This Privacy Policy explains how Obsidian, a UK-based company, collects, uses, and discloses personal information when you visit Our website www.obsidianos.com (the "Website") and use Our services (the "Services"). It also describes your choices regarding use, access, and correction of personal data.

1. Who We Are

Obsidian Technologies Limited (doing business as Obsidian) is a company registered in England and Wales (company number 16326982), with its registered office at 30 Churchill Place, Canary Wharf, London, England, E14 5RE, United Kingdom. We provide AI-powered practice management software and related technology services to financial advisers, Independent Financial Advisers ("IFAs"), and financial advisory firms in the United Kingdom. Our platform enables advisers to automate workflows, manage client relationships, and leverage artificial intelligence technologies including AI meeting notes, document digitisation, and portfolio aggregation.

2. Scope Of This Privacy Policy

This Privacy Policy applies to personal information We collect or process when you:

- Visit or interact with Our Website.
- Use or inquire about Our Services.
- Communicate with Us by phone, email, or other methods.

Because Our primary business is B2B (business-to-business), in many instances We process personal data on behalf of Our clients (financial advisory firms and IFAs). In those scenarios, Our clients control the data, and We act as a "data processor" as defined under UK data protection laws. Where We decide how and why personal information is processed, We act as a "data controller" as defined under UK data protection laws.

3. Information We Collect

3.1 Information You Provide To Us

- **Contact Information:** Such as name, business email address, business phone number, and company name when you contact us via Our Website, sign up for Our Services, or join Our mailing list.
- **Account Information:** If you or your firm register for Our Services, We may collect login credentials (usernames, passwords) and any information you choose to provide within your account profile.
- **Communications:** If you contact Us directly (e.g., through email or phone), We will receive your name, contact details, and any other information you choose to include in your message.

3.2 Information We Collect Automatically

- **Device and Usage Information:** We may automatically collect certain information about how you use our Website, including IP address, browser type, operating system, referring URLs, pages viewed, and other usage information.
- **Cookies and Similar Technologies:** We use cookies and similar tracking technologies to collect information about your interactions with Our Website. In particular, We use Google Analytics to help us understand how visitors use Our Website. Google Analytics collects information such as pages visited, time spent on pages, browser and device

information, approximate geographic location, and IP address (which is truncated or anonymised where required by applicable law). Google Analytics cookies are non-essential. For visitors in the UK/EEA they are only used where you have provided explicit consent.

You can manage your cookie preferences via your browser settings or by visiting Our Cookie Preferences page.

3.3 Information Collected Through Our AI Features

When you use Our AI-powered features, such as AI meeting notes, document digitisation, or AI search, We may process audio recordings, meeting transcripts, uploaded documents, and related content. This data is processed solely to provide and improve the relevant Service features, and is handled in accordance with Our data processing obligations and your firm's instructions.

3.4 Information Processed On Behalf Of Clients

When providing Our Services to financial advisory firms and IFAs, We may process personal data about their end clients and employees. This includes client names, contact details, financial information, portfolio data, and any other data uploaded to or generated within the platform. In this context, We act as a data processor, processing information solely on behalf of and under the instructions of Our clients.

4. How We Use Your Information

We use the information We collect for the following purposes:

1. **To Provide and Improve Our Services:** Including setting up user accounts, providing customer support, delivering AI-powered features (such as meeting summaries, document digitisation, and portfolio aggregation), and enhancing or personalising the functionality of Our platform.
2. **To Communicate With You:** Responding to inquiries, sharing information about Our Services, and providing important updates and administrative messages.
3. **For Business Operations and Analytics:** Monitoring and analysing usage, trends, and activities in connection with Our Website and Services to improve Our offerings.
4. **Legal Compliance and Security:** Complying with applicable laws and regulations (including Financial Conduct Authority requirements where applicable), and protecting Our rights, privacy, safety, or property (and that of Our users and the public).

When We process data on behalf of Our clients, We do so in accordance with Our contractual obligations and the instructions provided by Our clients.

5. Legal Basis for Processing (UK/EU Visitors)

Where the UK General Data Protection Regulation (UK GDPR) or EU General Data Protection Regulation (EU GDPR) applies, We rely on the following legal bases:

- **Contractual Necessity:** Where processing is necessary to provide you (or your firm) with Our Services or to take steps at your request prior to entering into a contract.
- **Legitimate Interests:** Where processing is in Our legitimate interests, for example, to improve and secure Our Services, and such interests are not overridden by your data protection interests or fundamental rights.
- **Consent:** For non-essential cookies such as analytics cookies (e.g., Google Analytics), We rely on your consent. These cookies will not be set unless you choose to enable them through Our Cookie Preferences settings.
- **Legal Obligations:** Where processing is required to comply with a legal obligation (e.g., regulatory requirements).

6. Disclosure of Your Information

We may share your personal data in the following circumstances:

- **Service Providers and Subprocessors:** With third-party vendors (e.g., cloud hosting, analytics, email delivery, AI model providers) who process data on Our behalf and under Our instructions.
- **Corporate Transactions:** In connection with a merger, acquisition, or sale of all or a portion of Our assets, subject to appropriate confidentiality measures.
- **Legal Requirements:** When We believe disclosure is necessary to comply with the law, enforce Our contracts, protect Our rights, or respond to lawful requests from public authorities (including the Financial Conduct Authority or the Information Commissioner's Office).
- **With Your Consent:** When We otherwise have your consent to share the information.

When acting as a data processor on behalf of Our clients, We only share personal data in accordance with the client's instructions or as required by law.

7. International Data Transfers

We are a UK-based company that primarily serves clients in the United Kingdom. Wherever feasible, We store personal data within the UK or the European Economic Area (EEA).

In certain circumstances, however, it may be necessary to transfer or access personal data from outside the UK/EEA (for example, where a subprocessor or AI service provider operates from another jurisdiction). In such instances, We take steps to ensure appropriate safeguards are in place, such as entering into Standard Contractual Clauses (SCCs), relying on the UK International Data Transfer Agreement (IDTA), or using other equivalent mechanisms, to protect your personal data in accordance with applicable data protection laws.

Use of Google Analytics may involve the transfer of certain pseudonymised usage data to the United States. Where this occurs, Google relies on appropriate safeguards such as SCCs. More information is available in Google's privacy documentation.

8. Data Security

The security of your information is important to Us. We implement technical and organisational measures designed to protect personal data from loss, misuse, unauthorised access, disclosure, alteration, or destruction. These measures include encryption in transit and at rest, secure hosting environments, two-factor authentication, strict access controls, and regular security assessments. The measures are designed to provide a level of security appropriate to the risk of processing.

9. Data Retention

We retain the personal data We collect from you for as long as necessary for the purposes described in this Privacy Policy. If you have a Customer Agreement with Us, We will delete your data in accordance with your Customer Agreement. Where We process data on behalf of Our clients, We retain such data as directed by the client or in accordance with Our contractual obligations.

How long We retain personal data will depend on a number of factors including:

- the terms of your Customer Agreement;

- compliance with (and demonstration of compliance with) Our legal obligations, to resolve disputes, and to enforce Our agreements; or
- in relation to Account Information, for Our tax, accounting, and audit requirements.

When We have no ongoing legitimate business need or legal reason to process your personal data, We will either delete or anonymise it or, if this is not possible (for example, because your personal data has been stored in backup archives), then We will securely store your personal data and isolate it from any further processing until deletion is possible.

10. Your Rights

Under applicable UK and EU data protection laws, you may have the right to:

- Access and obtain a copy of your personal data.
- Request rectification or erasure of your personal data.
- Object to or request restriction of processing of your personal data.
- Withdraw consent where We rely on your consent to process your personal data.
- Data portability, where applicable.

If you wish to exercise any of these rights or have questions about your rights, please contact Us using the details in the Contact Us section below. We will consider and respond to requests in accordance with applicable data protection laws.

If you believe We have infringed or violated your data protection rights, you have the right to lodge a complaint with your local data protection authority (in the UK, the Information Commissioner's Office at ico.org.uk).

11. Children's Privacy

Our Website and Services are not directed at individuals under the age of 18, and We do not knowingly collect personal data from minors. If you believe that a minor has provided Us with personal information, please contact Us so we can take steps to delete such information.

12. Cookies and Similar Technologies

We use cookies and similar technologies to operate and improve Our Website.

Strictly necessary cookies are used to enable core functionality such as page navigation, session management, and remembering your display preferences. These cookies are essential and cannot be turned off.

Analytics cookies (Google Analytics) help Us understand how visitors interact with Our Website so We can improve performance and usability. These cookies are non-essential. If you are located in the UK or EEA, they are only used with your explicit consent.

You can manage your cookie preferences at any time by visiting Our Cookie Preferences page.

13. Third-Party Links

Our Website may contain links to other websites or services that We do not control. This Privacy Policy does not apply to those third-party websites. We encourage you to review the privacy policies of those third parties to understand their practices.

14. Changes To This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in Our practices, technology, legal requirements, and other factors. When We do, We will post the updated Privacy Policy on this page and update the "Last updated" date at the top. We encourage you to review this page periodically to remain informed of any changes.

15. Contact Us

If you have any questions about this Privacy Policy or our privacy practices, please contact Us at:

Obsidian Technologies Limited

30 Churchill Place, Canary Wharf, London, England, E14 5RE

Company number: 16326982 (registered in England and Wales)

Email: support@obsidianos.com