

Privacy Policy

AEL-POL-001

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Privacy Policy

1 Introduction

1.1 Purpose & Objective

This Privacy Policy explains how Ask:Enact Ltd uses personal data through:

- The Ask:Enact website at askenact.com
- The Ask:Enact service directory
- The Ask:Enact application at prevent.askenact.com
- Contact forms, enquiries and related services

Ask:Enact is designed for professional use. The application helps authorised users understand situations, consider risks and identify possible next steps. It supports professional judgement. It does not replace it.

This policy has been developed in line with the requirements of the UK General Data Protection Regulation (GDPR).

1.2 Abbreviations

AEL	Ask:Enact Limited
AI	Artificial Intelligence
CHI	Community Health Index
GDPR	General Data Protection Regulation
ICO	Information Commissioner's Office
IP	Internet Protocol
ISO	International Organization for Standardization
NHS	National Health Service
POL	Policy
UK	United Kingdom

1.3 References

Document Number	Document Title
AEL-POL-002	Cookie Policy

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1.4 Privacy Information Summary

Area	Summary
Who We Are	Ask:Enact Ltd, registered in Scotland, company number SC843788
Contact	legal@askenact.com
Website	We collect limited technical, contact and service directory usage data
Service Directory	We collect search terms, filters used, service areas selected and service click-throughs
Application Access	The application is for authorised professional users only
Chat Content	Users are told not to enter names or direct identifiers
AI Use	Ask:Enact supports professional judgement. It does not make decisions about individuals solely by automated means
Model Training	We do not use user chat logs to train or fine-tune AI models
Hosting	The application is hosted in Microsoft Azure UK South
Funders & Stakeholders	We only provide aggregated, non-identifying reports unless otherwise agreed and lawful

1.5 Which Part Applies to You?

1.5.1 Website Visitors

If you visit askenact.com, we may collect basic technical data and page view information needed to operate and protect the website.

1.5.2 Service Directory Users

If you use the service directory, we may collect search terms, filters, service areas selected and services clicked. This helps us understand what people are looking for and improve the directory.

1.5.3 Authorised Application Users

If you use askenact.com, we may collect account details, login records, technical logs, usage data and chat content.

1.5.4 People Described in Scenarios

If you are described in a scenario entered by an authorised user, your information will usually have been entered by someone working for the organisation that gave them access to Ask:Enact. Users are told not to enter names or direct identifiers.

In many cases, we will not be able to identify you from the text entered. If you have questions about how your information has been used, you should normally contact the organisation that provided access to the user in the first instance.

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2 Privacy Policy Details

2.1 Who We Are

Ask:Enact Ltd is registered in Scotland.

Company Name:	Ask:Enact Ltd
Company Number:	SC843788
Registered Office:	8 Farburn Drive, Stonehaven, Kincardineshire, AB39 2BZ
Privacy Contact:	legal@askenact.com

Ask:Enact Ltd does not currently have a formal Data Protection Officer. We have assessed this position and keep it under review. Privacy queries should be sent to legal@askenact.com.

2.2 When We are Controller or Processor

Ask:Enact Ltd is the controller for personal data we collect and use for our own purposes. These purposes include:

- Operating the Ask:Enact website
- Running the service directory
- Responding to contact form enquiries
- Managing authorised application users
- Maintaining account, security and audit records
- Monitoring service use and performance
- Producing aggregated or pseudonymised usage insights
- Improving the application through benchmarking, testing and product analysis

For application content entered by authorised users, the organisation that provides access will usually be the controller. That organisation decides why its users use Ask:Enact, what content they enter and how outputs are used in its work.

In those cases, Ask:Enact Ltd acts as processor for that application content and processes it on that organisation's instructions.

Where Ask:Enact Ltd acts as processor, rights requests about application content should normally be directed to the organisation that provided access. We will support that organisation to respond to requests where required.

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2.3 Who This Policy Covers

This policy covers:

- Visitors to askenact.com
- People using the Ask:Enact service directory
- People who contact us through the website
- Authorised professional users of prevent.askenact.com
- Customer or organisation administrators
- People who may be described in scenarios entered into the application

The Ask:Enact application is not for direct public use. Access is restricted to authorised users with login details.

The service directory may be accessed by members of the public.

2.4 Data We Collect Through the Website and Service Directory

This information is collected through standard server logs and through analytics and monitoring tools used to operate the service directory and website.

Data We May Collect	Why We Collect It
Page view data	To understand use of the website and service directory
Search terms entered into the service directory	To understand what people are looking for
Filters used	To improve the directory and check whether filters are useful
Service areas selected	To understand which types of support people are looking for
Services clicked	To understand which services users choose to view
No-result searches	To identify gaps in the directory
Browser and device information	To monitor technical performance and compatibility
IP address	For security, technical logging and abuse prevention
Date and time of use	For analytics, security and troubleshooting
Standard technical logs	To operate and protect the website

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If you use a contact form, we may collect:

Data We May Collect	Why We Collect It
Name	To respond to your enquiry
Email address	To respond to your enquiry
Organisation	To understand the context of your enquiry
Message content	To deal with the matter you have raised
Any other information you choose to provide	To respond properly to your enquiry

You should not enter confidential, sensitive or identifying information into the service directory search box or contact form unless it is necessary.

2.5 Data We Collect Through the Ask:Enact Application

For authorised application users, we may collect:

Data We May Collect	Why We Collect It
First name and last name	To manage authorised accounts
Work email address	To identify and contact authorised users
Organisation or tenant	To manage access and separate organisation use
Role or team, where provided	To manage access and reporting
Login and logout records	To protect the application and maintain audit records
Password reset activity	To manage account security
Account status	To control access
IP address	For security, technical logging and troubleshooting
Browser user-agent	For technical support and security monitoring
Technical logs	To operate and protect the application
Audit logs	To support accountability and investigate issues
User-entered chat content	To generate responses and maintain appropriate records
Generated responses	To provide the application and support review where needed
Feedback submitted by users	To improve the service
Service usage data	To understand how the application is used
Organisation-level analytics	To provide reporting and improve the service

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The application is text only. It does not currently collect uploaded files through the chat.

2.6 Chat Content and Personal Data

Ask:Enact is designed to work without names or direct identifiers.

Do not enter names or direct identifiers

Users should describe situations in general terms. Ask:Enact is designed to support professional thinking without needing names, addresses, dates of birth, reference numbers or other details that identify a person.

Users should avoid entering:

- Names
- Home addresses
- Dates of birth
- Phone numbers
- Email addresses
- NHS, CHI, police, court or case reference numbers
- Detailed information that could identify a person
- Unnecessary special category data
- Unnecessary criminal offence data
- Operationally sensitive information

If a user enters personal data despite this instruction, it may be stored in the chat transcript. Where we identify unnecessary direct identifiers, we will endeavour to remove or minimise them.

Ask:Enact may process themes and inferred analytics from conversations. We do not use user chat logs to train or fine-tune AI models. Product improvement is carried out through benchmarking tests, test questions, quality checks and non-identifying analysis.

2.7 Sensitive Information

Ask:Enact is not intended to collect identifiable special category data or criminal offence data as part of normal use.

However, because users may describe complex professional situations, chat content could include references to:

- Health
- Disability
- Mental health

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- Domestic abuse
- Substance use
- Ethnicity
- Family circumstances
- Safeguarding concerns
- Criminal justice involvement
- Police contact
- Custody
- Offending history

Users should avoid entering information that directly identifies the person being discussed unless their organisation has confirmed there is a lawful basis and agreed process for doing so.

Where sensitive information is entered unintentionally, we will restrict access, minimise use and remove it where possible and appropriate.

For special category data or criminal offence data, the relevant organisation must identify the appropriate additional condition and safeguards where that data is intentionally processed. Where Ask:Enact Ltd processes this type of data as controller for any activity, we will identify and apply an appropriate condition and safeguards.

Ask:Enact is designed to minimise the need for this type of data.

2.8 Why We Use Personal Data

We use personal data to:

- Provide and operate the website
- Provide the service directory
- Respond to enquiries
- Create and manage authorised user accounts
- Authenticate users
- Provide the Ask:Enact application
- Generate responses to user-entered text
- Produce action plans or summaries where the application supports this
- Suggest relevant service options
- Monitor service performance
- Protect the security of the platform
- Investigate errors, misuse or technical issues
- Maintain audit records
- Understand how the website and application are used
- Improve the service through benchmarking and product testing
- Produce aggregated or pseudonymised reporting

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- Meet legal, contractual and regulatory obligations

We do not sell personal data.

We do not use personal data for advertising.

2.9 Lawful Basis

We rely on different lawful basis depending on the activity.

Where we act as a processor for an organisation, for example for application content entered by its users, that organisation is responsible for identifying and communicating the lawful basis for that processing. We process that data on its instructions.

Activity	Lawful Basis
Website operation and basic technical logs	Legitimate interests
Contact form enquiries	Legitimate interests, or contract where the enquiry relates to a service request
Service directory analytics	Legitimate interests
Search terms, filters and click-through analytics	Legitimate interests
User account administration	Legitimate interests, contract, or processor activity under customer instructions
Authentication and access records	Legitimate interests
Application use by authorised professionals	Legitimate interests, contract, or processor activity under customer instructions
Security monitoring and audit logs	Legitimate interests, including security, misuse prevention and service integrity; legal obligation where we are required to keep specific records or share information with regulators or authorities
Aggregated or pseudonymised reporting	Legitimate interests
Legal claims, compliance or regulatory matters	Legal obligation and legitimate interests

Where an organisation uses Ask:Enact for its own professional duties, that organisation may have its own lawful basis for the data entered by its users. This may include public task, legal obligation, legitimate interests or another lawful basis depending on the organisation and use case.

2.10 Legitimate Interests Explained

Legitimate interests means we use personal data where there is a genuine and proportionate reason to do so, where the use is necessary and where people's rights and freedoms do not override that interest.

For Ask:Enact, this includes:

- Keeping the website and application secure
- Managing authorised access
- Understanding whether the service is useful
- Improving the service
- Identifying common themes and service needs
- Preventing misuse
- Supporting audit and accountability

We will not rely on legitimate interests where the impact on individuals would be unfair or excessive.

You have the right to object to processing based on legitimate interests. See section 2.18 below.

2.11 AI Processing

Ask:Enact uses large language model technology through Microsoft Azure OpenAI.

When a user submits text in the application, that text may be sent to Azure OpenAI so that a response can be generated.

AI supports the user. It does not decide.

Ask:Enact supports professional judgement. It does not make decisions about individuals solely by automated means. Users must review outputs and decide what action is appropriate in their professional context.

We do not use user chat logs to train or fine-tune AI models.

Azure OpenAI prompts and completions may be stored where this is enabled for service operation, audit, monitoring or troubleshooting. They are retained for no longer than necessary for those purposes. Access is restricted.

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2.12 Who We Share Data With

We may share or process data with the following categories of recipient, as processors or sub-processors acting on our behalf, or where applicable as independent controllers:

Recipient or Category	Purpose
Microsoft Azure	Hosting and infrastructure
Azure OpenAI	AI-assisted response generation
Application Insights	Service directory analytics and technical monitoring
Authorised Ask:Enact personnel, including supplier personnel where appropriate	Support, security, administration, quality, troubleshooting and governance
The organisation that provided a user with access	Where appropriate for account administration, governance, support, reporting or rights requests
Regulators, authorities or advisers	Where required by law or needed to protect legal rights
Funders or stakeholders	Aggregated, non-identifying reports only, unless otherwise agreed and lawful

Only selected authorised Ask:Enact personnel may access chat transcripts. They may only do this where there is a valid reason, such as support, security, quality assurance, troubleshooting or governance.

We do not provide raw chat transcripts to funders.

2.13 International Transfers

The Ask:Enact application is hosted in Microsoft Azure UK South.

We aim to keep application data hosted in the UK. Some limited access from outside the UK may occur where needed for supplier support, security, monitoring or service operation. Where this happens, we use appropriate safeguards.

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2.14 How Long We Keep Data

We keep personal data only for as long as needed.

We aim to apply the following standard retention periods. These may vary where a customer agreement, legal duty, investigation, regulatory requirement or technical limitation applies.

Data Type	Standard Retention Period
Contact form enquiries	Up to 24 months after the last meaningful contact, unless needed for a contract, dispute or legal duty
Service directory raw analytics	Up to 12 months
Aggregated service directory statistics	Up to 5 years, or longer where individuals are not identifiable
Application technical logs	Up to 90 days, unless needed for security or incident investigation
Authentication and access logs	Up to 12 months
User account records	While the account is active, then up to 12 months after closure
Chat transcripts	Up to 12 months by default, unless a customer agreement sets a shorter or longer period

Some copies may remain in backups for a limited period until overwritten or securely deleted in line with our backup processes.

2.15 Security

We use technical and organisational measures to protect personal data, including:

- Encryption in transit
- Encryption at rest
- Role-based access control
- Multi-factor authentication where appropriate
- Audit logging
- Restricted administrative access
- Least-privilege access
- Monitoring and technical logging
- Secure cloud hosting
- Retention controls

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We also have procedures to assess, manage and escalate suspected personal data breaches, including notifying regulators and affected individuals where required.

Ask:Enact Ltd is working towards Cyber Essentials, ISO 27001 and ISO 9001. These are current goals, not completed certifications.

2.16 Cookies and Similar Technologies

We have a separate Cookie Policy. It explains any cookies or similar technologies we use, including analytics and monitoring tools, and the choices available to you.

At present, we do not use advertising cookies or tracking pixels.

The service directory uses Application Insights for analytics and technical monitoring. Our Cookie Policy explains whether this involves any browser cookies or local identifiers and, where required, how you can control their use.

Refer to AEL-POL-002 Cookie Policy for further details.

2.17 Children

The Ask:Enact application is intended for professional users only. It is not intended for direct use by children.

Professional users may ask questions about situations involving children or families. They should avoid entering information that directly identifies a child unless their organisation has confirmed there is a lawful basis and agreed process for doing so.

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2.18 Your Rights

Depending on the circumstances, you may have the right to:

Right	What it Means
Access	You can ask for a copy of your personal data
Correction	You can ask us to correct inaccurate or incomplete data
Deletion	You can ask us to delete personal data in certain circumstances
Restriction	You can ask us to restrict how we use personal data in certain circumstances
Objection	You can object to processing based on legitimate interests
Portability	You can ask for certain data in a portable format, where this right applies
Complaint	You can complain to the Information Commissioner's Office

Some rights may not apply in every situation. For example, where Ask:Enact Ltd acts as a processor for another organisation, we may need to refer your request to that organisation.

We will respond to requests without undue delay and usually within one month. We may ask for information to confirm your identity.

Where a request is complex, we may extend the response time and will explain why. We do not normally charge a fee, but a reasonable fee may apply in limited circumstances.

To exercise your rights, contact: legal@askenact.com

2.19 Requests About Application Data

If you are an authorised user, we can usually identify records linked to your user account.

If a person is described in a chat without names or direct identifiers, we may not be able to identify records about that person.

If you ask us to delete a transcript, we will review the request and delete it where we can and where no legal, contractual, audit or security reason requires us to keep it.

Where application content is controlled by the organisation that provided access, we may need to direct the request to that organisation.

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2.20 Complaints

You can contact us first at: legal@askenact.com

You also have the right to complain to the Information Commissioner's Office (ICO), contact details are as follows:

Website:	https://ico.org.uk
Address:	Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Telephone:	0303 123 1113

2.21 Changes to this Policy

We may update this Privacy Policy as Ask:Enact develops, as customer arrangements change, or as legal and regulatory requirements change.

The latest version will be published on the Ask:Enact website.