POLICY

Privacy Notice

Plain English, audit-grade. The same standard we hold for client engagements applies to this website. No third-party analytics, no advertising trackers, no nurture sequences.

VERSION	v1.6
CONTROLLER	Talon Compliance, Inc., trading as Talon Global
JURISDICTION	Operated from Dubai, UAE. Written to the EU GDPR, the UK GDPR and the UAE Personal Data Protection Law. US state law: see section 09.
APPROVED	Darren Watts, Founder, 23 Nov 2026

01 Who we are

This policy covers the talon.ae website, the Talon readiness check, Talon CO and Talon Evolve where we decide how personal data is used. They are operated by Talon Compliance, Inc., trading as Talon Global, from Dubai, UAE. The data controller is Talon Compliance, Inc. The only processors we use are the ones named in section 06. This policy also covers our first approaches to businesses that have not contacted us (section 13).

Where we hold data for a Talon CO client inside their workspace, the client decides how it is used and we act on their instructions. Section 12 explains this.

If you have a question about this policy, write to darren@talon.ae. We aim to reply within one working day, Dubai time.

02 What we collect

The minimum required to do the work, and not a byte more. Nine categories:

- **Waitlist emails.** Email address only, submitted on the Talon CO waitlist. Used once, to tell you when access opens.
- **Contact form.** Name, email, company (if given), topic and message, submitted via the contact form. Used to reply to you, no mailing list, no follow-up sequence, and kept per section 08 (engagement records if it becomes one, otherwise deleted within 12 months).
- **Inbound email.** If you write to darren@talon.ae directly, we hold the contents of your message and any attachments for as long as the engagement is live, and per section 08 thereafter.
- **Readiness check request.** Your name, work email, company and one line on what you need, from the request form on talon.ae, or passed to us by a partner who has asked you first. If a

partner passed them to us, we tell you who in our first email. Used to decide whether a readiness check fits and to send your invite.

- **Readiness check.** If we invite you to our readiness check: your name, role, work email and phone; your company's name, country and website; and facts about your company that you give us (what you do, how many people work for you, who would use Talon, the standards you hold and need, whether you have a compliance manager or outside support, the titles of documents you hold, your last audit, how you run compliance today, whether teams work away from the office, your main problem and the languages your teams use). Also your answers to any follow-up questions, what you accepted and when, your choice on improving our AI, and the records of your invite and email check. No document uploads. We ask you not to include health details or other sensitive information about anyone.
- **Your public website.** If you give us your website, our AI may read its public pages to inform your readiness report. We read only pages anyone can see.
- **Talon CO accounts.** For people who use Talon CO: name, work email, role, sign-in records and a record of what you do in the system, including what our AI proposed and who decided on it. What a client puts into its own workspace is covered by section 12.
- **Server logs.** Standard request logs at the hosting layer (IP, user-agent, request path, timestamp). Retained 30 days for security and abuse triage. Not joined to any other dataset.
- **Business contacts we approach.** Company details from public sources and, where we write to a named person: name, job title, business email address or public profile link, where we found you, and a log of our messages and your replies. We do not collect personal phone numbers or home addresses for this. When Darren approaches someone on LinkedIn, we record only that we made contact against the company, not the person's name. Section 13 has the detail.

We do not run client-side analytics, fingerprinting, session replay, or advertising pixels. We do not buy contact lists, we do not use data brokers and we do not use paid data enrichment tools. The public sources we read to find business contacts are listed in section 13.

03 Why we collect it

Six reasons, all named in advance:

- **Tell you once.** The Talon CO waitlist exists so we can send a single email when access opens. There is no follow-up sequence.
- **Prepare your readiness report.** To prepare an indicative report from your answers, have a person at Talon review it, send it to you, and talk it through with you if you want. If you sign up, your answers carry into your Talon CO onboarding so you do not answer twice.
- **Run the practice.** If we engage, we hold the records that any compliance-grade engagement requires: scope, deliverables, correspondence, invoices.
- **Run Talon CO.** To provide the service to our clients' users, keep it secure, support them, and keep the records that show who did what.
- **Improve our AI, only if you agree.** See section 05.
- **Approach businesses.** To tell a business about Talon CO or Talon Evolve and, if you reply, to talk to you. We check sanctions lists before we write. See section 13.

04 Lawful basis

- **Consent.** The Talon CO waitlist email. You give it to us, we use it once, you can withdraw at any time per section 09. Using your readiness check answers to improve our AI: only if you tick the box, and you can withdraw at any time. Withdrawing does not affect anything else.
- **Legitimate interests.** Replying to inbound email. Preparing the readiness report you asked for and reading your public website for it: our interest is answering a business's own request. Keeping Talon secure through logs. Writing first to a business contact and keeping a log of it: section 13 sets out the interest and the limits. These interests do not override your fundamental rights.
- **Contract / legal obligation.** If you become a client, processing is necessary to perform the engagement or provide Talon CO, and to meet our retention obligations under UAE and applicable UK regulation.
- **UAE PDPL.** Where the UAE law requires consent, the acceptance you give before sending your readiness check answers is that consent. For business contacts in the UAE we rely on the exception for personal data that a person has made public by their own act, we write to company addresses first, and you can object at any time.

05 How we use AI

- **Readiness check.** Our AI reads your answers and, if you gave one, your public website. It may ask you a few follow-up questions, which are marked as written by AI, and it drafts your report. A person at Talon reviews every report before it is sent. No decision about you is made by AI alone.
- **Talon CO.** Our AI proposes; a person decides. Each AI proposal that is applied in Talon CO is decided by a named person, and we record what the AI proposed and who decided.
- **Talon Evolve deliverables.** Deliverables may be drafted using privacy-configured AI tools (including Anthropic's Claude), with personal identifiers added locally prior to delivery.
- **Our AI provider.** We use Anthropic's Claude models. Under Anthropic's commercial terms, Anthropic may not train its models on the content we send.
- **Improving our own AI.** We improve how our AI works (its instructions and the knowledge it draws on), not our provider's models. From the readiness check we only use your answers if you tick the box, and we remove your name, contact details and company name first. From Talon CO we only use a client's data where the client's agreement allows it; each client's own workspace also learns from its own use, for that client alone.
- **Withdrawing.** You can withdraw at any time by emailing darren@talon.ae. We then stop using your answers. Improvements already made from answers with names removed cannot be picked out and undone, and we say so up front.
- **Finding businesses.** Our AI reads public company web pages to help prepare a short note on a company. It does not store the names of people it reads on those pages. Darren writes and sends every outreach message himself, from his own email and LinkedIn account. AI may help with a draft. Nothing is sent automatically, and no decision about you is made by AI.
- **Content from outside.** We treat text from websites and from free-text answers as information to read, never as instructions to our AI.

06 Who we share it with

Named processors only. No others. We do not sell, rent, or syndicate your data.

- **AI.** Anthropic (anthropic.com) provides the AI models for the readiness check and Talon CO. It may not train its models on our content.
- **Database.** Supabase (supabase.com) stores waitlist and contact-form submissions, readiness check submissions and Talon CO data, hosted in the EU (Frankfurt). Website forms are written through a restricted database function using a publishable key, never a secret credential and never granting access to anything else.
- **Hosting.** Vercel (vercel.com) hosts the website, the readiness check and Talon CO. Server logs as described in section 02.
- **Email.** Resend (resend.com) sends email from the website, the readiness check (invites, email checks, your report) and Talon CO. Data in transit is TLS-encrypted; Resend keeps delivery logs per its own policy.
- **Error monitoring.** Sentry (sentry.io) records errors in Talon CO, in its EU region, with personal data stripped before it leaves us.
- **Email and files.** Google Workspace (Gmail) runs the inbox at darren@talon.ae and the account Darren sends outreach from. Microsoft OneDrive stores our working files, including the log of business contacts.
- **LinkedIn.** Darren uses LinkedIn to message some business contacts. LinkedIn is not our processor and keeps the conversation under its own privacy terms.
- **Partners and resellers.** We do not pass your details to a partner or reseller without asking you first.
- **When the law requires it.** We disclose data to an authority only where the law requires us to.

07 International transfers

We operate from the UAE and store data in the EU (Frankfurt). Some of our providers process data in the United States. Where data moves out of the EU or the UK to a country without an adequacy decision, we rely on the standard contractual clauses in our providers' data processing terms, with the UK addendum where UK data is involved. Where the UAE law applies, we rely on the transfer grounds it allows. You can ask us for a copy of the safeguards at darren@talon.ae.

08 How long we keep it

- **Waitlist.** Held until the launch email is sent, then deleted within 30 days. Earlier on request.
- **Engagement records.** Six years from the close of the engagement, in line with UK statutory limitation and standard professional-services practice.
- **Contact enquiries (no engagement).** If a contact-form enquiry does not lead to an engagement, it is deleted within 12 months.
- **Readiness check (no engagement).** If you do not go ahead, we delete your request, answers and report 12 months after the last step: we sent your report, you sent your answers, your invite expired, or you sent a request we did not take up. Sooner if you ask. We keep only anonymous totals (how many checks, quotes and wins).
- **Readiness check (you sign up).** Your answers carry into your Talon CO onboarding and are then kept as client records. The separate readiness check copy is deleted within 30 days of the move.

- **AI improvement extract.** If you ticked the box: a copy with your name, contact details and company name removed, kept apart from your submission until you withdraw or it is no longer useful, and reviewed at least once a year.
- **Invite links and reports.** Invite links are single use and expire after 14 days. Your online report stays open for 30 days.
- **Talon CO.** For as long as the client agreement runs, and afterwards as that agreement sets.
- **Business contacts, no reply.** If you do not reply to our message and our two follow-ups, we delete your name, job title and contact details 12 months after our last message. We may keep the company's name and the outcome, which is not personal data.
- **Business contacts, you reply.** If you reply and we talk, your details are kept under the rules above for contact enquiries and engagement records.
- **Do-not-contact line.** If you ask us not to contact you, we keep one minimal line (your email address or profile link, your company, the date) so that we do not write to you again. It is the only thing we keep, and we keep it until you ask us to remove it.
- **Server logs.** 30 days, then purged automatically.

09 Your rights

You can ask to see the personal data we hold about you, correct it, delete it, restrict or object to how we use it, take a copy to another provider, and withdraw any consent you gave. Withdrawing is as easy as giving it: one email does it. Write to darren@talon.ae; a request from the email address we hold is normally enough to confirm it is you. If we have written to you first as a business contact, replying "no" to our message is enough to object: we stop writing to you and add you to our do-not-contact line within one working day, Dubai time.

We acknowledge your request within one working day and answer it in full within one month. If a request is complex or you send several, we may take up to two more months and will tell you why within the first month. This meets the EU and UK GDPR. The UAE law sets no general time limit in days; we apply the same month.

US state law. Talon is currently below the thresholds of the US state privacy laws we have checked, including California's. We honour the same rights for everyone anyway.

You can also complain to the data protection authority where you live or work: in the UK, the Information Commissioner's Office; in the EU, your national authority; in the UAE, the UAE Data Office. We will tell you which applies if you ask.

10 Cookies and tracking

talon.ae sets no cookies, except one on the readiness check. That cookie (talon_readiness) is strictly necessary: it keeps your readiness check session secure for up to 2 hours and holds no answers, name or email. Talon CO uses only strictly necessary cookies to keep you signed in. There is no advertising tracker, no analytics tag, no session-replay script, no fingerprinting library. If that changes, this section will name the cookie, its purpose, and its expiry, and a banner will ask before any non-essential cookie is set.

11 Security

Data in transit is TLS 1.2+ everywhere. Form submissions traverse Vercel and Resend over encrypted channels. Readiness check submissions are kept in their own store, apart from client workspaces and

from our demonstration system, and only the founder can read them. Engagement records and Talon CO data are held in encrypted-at-rest storage; access is limited to the founder and named delegates, and any Talon support access to a client workspace is logged. We do not process payment-card data on this site.

If a breach puts your rights at risk, we will tell you without undue delay, and the regulator within 72 hours where the law requires it, in plain English, with no PR varnish.

12 Talon CO clients

When a business uses Talon CO, it decides what goes into its workspace and how that data is used. For that data the client is the controller and Talon is its processor: we act only on the client's instructions, under our agreement with them and its data processing terms. The client owns its compliance; Talon CO supports the work, it does not take responsibility for it.

If you are a user in a client's workspace and want to use your rights over the data in it, contact that client. We help them respond. Any Talon support access to a client workspace is limited, approved and logged.

13 Business contacts we approach

Sometimes we write first to a business that has not contacted us. This section covers the people at those businesses.

- **Who we approach.** Companies we think Talon CO or Talon Evolve could help. We start with security companies. Darren Watts writes to them himself, by hand, from his own email and LinkedIn. There is no automated sending, no mass mailing and no LinkedIn automation.
- **What we hold.** Mostly company information: name, website, services, the standards the company says it holds, and a general contact address from its own website. Where we write to a named person: name, job title, business email address or public profile link, where we found you, and a log of what we sent and what you replied. We do not collect personal phone numbers or home addresses for this. When Darren approaches someone on LinkedIn, our records note only that we made contact against the company, not the person's name. The conversation itself stays in his LinkedIn account under LinkedIn's terms. If you then move the conversation to email, your details are kept as in section 08.
- **Where we get it.** Public sources only: the public ICoCA member directory, company websites, public LinkedIn profiles, public job and tender notices, and Darren's own professional network. Our first message says which one. We do not buy contact lists, we do not use data brokers and we do not use paid data tools.
- **Why.** To offer a business help with compliance and, if you reply, to talk to you. Before we write, we check each company, and later each named person, against sanctions lists. We do not start a relationship we could not complete.
- **Lawful basis.** Legitimate interests under the EU and UK GDPR. Our interest is telling a business about a service that fits its work. We limit it: we start with company addresses, we write only about your role, we tell you where we found you, and you can say no at any time. Where the law of the country you work in would need your consent for a message like ours, we do not write to you by email or message until we have checked that country's rules. Section 04 covers the UAE.
- **How we write.** Our first message names who we are, says where we found you, gives a plain way to say no and links to this page. We follow up on about day 5 and day 12, then stop.

- **Who sees it.** Darren Watts. The processors that hold it are Google (email), Microsoft (file storage), Anthropic (AI, section 05) and, for sanctions checks, Talon CO on Supabase and Vercel (section 06). We do not sell, rent or share it.
- **Transfers.** Section 07 applies. Some of these providers process data in the United States.
- **How long.** Section 08 sets the periods: 12 months after our last message if you do not reply, and a minimal do-not-contact line if you ask us to stop.
- **Your rights and how to say no.** All your rights in section 09 apply, in particular the right to object. Reply "no" to any message from us, or write to darren@talon.ae. We stop writing to you and add you to our do-not-contact line within one working day, Dubai time, and we remove your other details in the same step. Complaints: section 09.

14 Changes to this policy

Material changes get a new version number, a new effective date, and an email to anyone we hold a current address for. Cosmetic changes (typos, clearer wording) are made silently. The current version is shown at the top of this page.

15 Contact

For anything in this policy: darren@talon.ae. Direct line. Read by Darren. We aim to reply within one working day, Dubai time.