



## Axeten Investigation Processing Privacy Policy

February 2025

### Introduction

Axeten Ltd is a UK registered Open Source Intelligence company, providing OSINT investigation and training services and intelligence gathering products. Also, OSINT is known as III or i3, which is an acronym for Internet Intelligence and Investigations. We are committed to providing quality services to you, and this policy outlines our ongoing obligations to you, in respect of how we manage personal information. This policy details the collection, storage, use and disclosure of personal information, relating to the provision of our investigation processing service.

### Relevant Legislation

We comply with laws, regulations and guidelines pertaining to access, use, storage, protection and disclosure of personal information. Specifically, Axeten is compliant with The Data Protection Act 2018, the UK GDPR and EU Regulation 2016/679 (GDPR). Please read all of our compliance documents provided at <https://www.axeten.com/documents>

### Legal Basis

The legal basis that we rely upon, where providing our investigation processing services to you, is:-

- consent, and;
- contractual obligation.

Where you choose to use our investigation services, you authorize Axeten to process personal information on your behalf, so that we might provide our service to you. So that we might perform the contract between you and Axeten, we shall process the personal data of third parties, that you supply to us.

### Responsibility and Legal Requirements of our Customers

Before you disclose to us any personal information relating to a third party, you are obliged to have documented the legal basis for your instruction and the subsequent disclosure of personal information, relating to third party, so that we might process that personal information, in compliance with your instruction and the relevant legislation. So that, where an instruction is remitted to Axeten, it is tacitly implied that the legal basis has been documented in compliance with the GDPR. By instructing Axeten, you pass to Axeten the authority to process personal data on your behalf.



### Confidentiality & Privacy

All of the information that we might locate about a person, at the time that the information is located, is in the public domain.

We accept and anticipate that personal information might be withdrawn from the public domain, so that the subject might claim that the information is private. However, at the time the personal information was gathered, it was in the public domain.

We might have no record or knowledge of personal information being removed from the public domain.

We treat all information that has been located, as confidential and private.

### Personal Information Collected During the OSINT Investigation Process

The OSINT investigation process performed by Axeten, gathers information about subjects detailed within an instruction and any connected associates, from a variety of online social networking sites and other publicly available databases and websites. Our investigation aims to locate any relevant online publicly available content, that might be in text, photographic or video format.

During the OSINT investigation process, we may collect, process and store information that has been made publicly available. This information might include:-

- names, contact details, gender, date of birth, and;
- relationship status, family information, friends and other human connections, and;
- interests, pastimes activities, hobbies and beliefs, and;
- memberships, employment, business and property details, and;
- publicly available legal documents that relate to the instruction, and;
- information contained within any publication or communication, that is in the public domain, and that is related to the instruction, and;
- metadata associated with any communication, and;
- other information, that is not personal and is without the remit of this policy document.

### Use of Personal Information

Personal information collected during the investigation process, is used for the sole purpose of providing our services to our customers.

### Storing Personal Information

The personal information that you provide to us, is stored in our Customer Relationship Management (CRM), on secure servers located in the EU.

We use appropriate technical and organisational measures to protect the personal information that we store about you.

For information on our security plan and procedures, please read our Security Policy.



Our Data Handling Policy is available on request. The document includes our Data Deletion Policy.

### **Access to your Personal Information**

You may access the personal information that we hold about you, which is stored in our CRM.

Upon request, we can supply a login that shall display the personal information that we hold about you.

Where you wish to access the personal information that we hold about you, please contact us by e-mail on [compliance@axeten.com](mailto:compliance@axeten.com) and be tolerant of our vetting process, so that we are sure you are the authentic contact.

### **Security of Personal Information**

We take the threat of data breach seriously.

We employ security measures, consistent with best practice, to protect against unauthorised access to the personal information submitted to us.

For information on our security policies and procedures, please read our Security Policy and Data Breach Policy.

### **Disclosure of Personal Information**

We are committed to providing complete confidentiality, so that any personal information located during the investigation process, shall remain private and shall be disclosed only to the party requesting the information.

Axeten shall disclose the personal data to you by way of a confidential report, within a complete case bundle, that details the investigation process.

### **Return and Deletion of Personal Information**

We shall safely and securely return to you all personal information, collected during the investigation process, and we shall delete from our servers, any document containing personal information controlled by you.

For more information, please our Data Handling Policy is available on request. This document includes our Data Deletion Policy.

### **Notification of changes to this policy**

This policy shall be reviewed and updated annually, to reflect any changes to our privacy practices in compliance with prevailing legislation, best practice and technology enhancements.

Please check this policy regularly.



### References

To read and download our compliance documents, please go to

<https://www.axeten.com/documents>

- Axeten Security Policy
- Axeten Data Breach Policy
- Axeten Training Privacy Policy
- Framework Data Processing Agreement
- Axeten Data Protection Compliance Statement
- Axeten Modern Slavery Policy
- Our Data Handling Policy is available on request. The document includes our Data Deletion Policy.

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