



# Data Security & Privacy Policy

How Own Your Numbers protects your accounting and financial data

**Version:** 3.0

**Last Updated:** 14 April 2026

**Effective Date:** 14 April 2026

## 1. WHAT WE DO WITH YOUR DATA

Own Your Numbers ("OYN") connects to your Xero account with **read-only access** to produce cash flow analysis reports. We never create, edit, or delete records in Xero.

### Data we use

- Accounting reports and transaction data from Xero (read-only)
- Company name, reporting periods, and account classifications
- Your email address for authentication

### Data we do not collect

- Payment card information or banking passwords
- Raw accounting data beyond what is needed to run the analysis

## 2. HOW IT WORKS

When you run a report, OYN reads your Xero data, runs the analysis, and produces a cash report. If AI narrative is enabled, a summary of the numbers (not the raw ledger) is sent to **Google Vertex AI Enterprise (Gemini)** to write the commentary. The PDF is created for download and then deleted.

## 3. DATA RETENTION

We keep data only as long as needed to provide the service.

Data Type	Retention Period	Notes
<b>Raw Xero data</b>	Not retained	Used during analysis only
<b>PDF reports</b>	Deleted after download	Scheduled cleanup as safety net
<b>Analysis results</b>	24 hours	Auto-deleted by retention system
<b>Processing logs</b>	30 days	High-level metadata only, no accounting detail
<b>Account records</b>	Until account deletion	Email, connection state, invitations

Our retention system runs hourly to delete expired data. You can request immediate deletion by emailing [support@ownyournumbers.com](mailto:support@ownyournumbers.com).

## 4. AI HANDLING

OYN uses **Google Vertex AI Enterprise (Gemini)** to write the narrative in your report. We only send it the numbers — aggregated cash figures, aging summaries, and derived metrics — never the raw ledger. Your data is not used to train any models.

## 5. INFRASTRUCTURE & SECURITY

OYN does **not keep your raw Xero data**. We pull it, run the analysis, and discard it. What we do keep are the short-lived results of that analysis, plus the basics needed to run the service — your account, connection state, and high-level logs. Retention periods for each are in section 3.

- Hosted on **Google Cloud Platform, UK region**
- Encrypted in transit (TLS) and at rest
- Read-only Xero access — we never request write permissions
- Only the connection owner can share, revoke, or disconnect a Xero organisation
- GCP infrastructure is independently certified to **SOC 1, SOC 2, SOC 3, ISO 27001, ISO 27017, and ISO 27018** — covering physical security, access controls, encryption, and data protection

## 6. THIRD-PARTY SERVICES

Service	Purpose	Location
<b>Xero</b>	Identity sign-in and accounting data access	Per Xero terms
<b>Google Cloud Platform</b>	Hosting, compute, storage	UK
<b>Mailgun</b>	Transactional emails	EU
<b>Google Vertex AI Enterprise (Gemini)</b>	Financial narrative generation	EU

## 7. YOUR RIGHTS & CONTACT

You have the right to access, correct, or delete your data. To make a request or ask a question:

[support@ownyournumbers.com](mailto:support@ownyournumbers.com)

### Incident Response

If we identify a security incident affecting customer data, we will investigate, contain, and notify affected parties as required by law.

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End of Policy Document