

# TALENT JOURNEY

## Data Protection Impact Assessment

Required by Article 35 UK GDPR. Must be signed by the data controller before live AI processing begins.

AI Advisory Platform — Phase 1 | May 2026

Field	Detail
Organisation	Talent Journey Operations Limited (No. 15828503)
Data Controller	Hugo Sugden, Director
DPO	Rob White — dpo@wearetalentjourney.com
Prepared by	Mark Beal-Preston
Date	May 2026
Review date	May 2027 or on material change to processing
Status	DRAFT — requires sign-off before live member data is processed

## 1. The Processing Activity

Element	Detail
Purpose	Building an AI-powered advisory knowledge base to deliver on-demand strategic advice to recruitment founders.
Nature	Session transcripts uploaded, transmitted to US-based AI language model providers, anonymised, structured insights retained. Raw data deleted immediately post-processing.
Personal data	Names, contact details, business information, and potentially sensitive professional context in session transcripts. Member account and profile data. Voice and video during AI avatar sessions.
Data subjects	Members (recruitment founders) and third parties mentioned in sessions (clients, candidates, colleagues — who have not consented to this processing).
Recipients	AI language model providers (US), AI avatar provider (US), AI transcription provider, platform infrastructure provider, technical development partner.
International transfers	All AI providers US-based. UK IDTA or UK Addendum to EU SCCs applied.
Retention	Raw transcripts: deleted immediately. Anonymised knowledge base: duration of platform operation. Member data: 7 years post-membership. Financial: 7 years.
Lawful basis	Legitimate interests — Article 6(1)(f) UK GDPR. LIA maintained separately.

## 2. Necessity and Proportionality

Question	Assessment
Is processing necessary?	Yes. The knowledge base cannot be built without processing session content. No equivalent source of advisory expertise exists.
Alternatives considered	Manual curation only (impractical at scale). Deterministic pre-processing anonymisation (Phase 2 target — not yet feasible). Processing summaries only (reduces quality — partially adopted). None fully achieves the purpose.
Is processing proportionate?	Yes. Raw data deleted immediately. Only anonymised insights retained. Members informed and can opt out. Providers engaged under no-training DPAs.

## 3. Risk Register

ID	Risk	Severity	Likelihood	Level	Mitigation	Residual
R1	Raw data transmitted before anonymisation	High	Certain	High	Strict AI anonymisation instructions. Providers under no-training DPAs. Immediate deletion post-processing. Human review of all outputs.	Med
R2	Third-party data processed without consent	High	Likely	High	Members instructed to redact. AI anonymisation applied. Privacy notice and contract updated. LIA balancing test conducted.	Med
R3	DPIA not completed	High	Mitigated	Low	This document — to be signed before go-live.	Low
R4	AI anonymisation failure	High	Low	Med	Enterprise-grade providers. Human review mandatory. ZDR where available.	Low
R5	Unlawful international transfer	High	Mitigated	Low	UK IDTA / SCCs in place with all providers.	Low
R6	Data breach at AI provider	High	Low	Med	SOC 2 Type II providers. DPAs with 72hr notification. ZDR reduces exposure.	Low
R7	Insufficient transparency	High	Mitigated	Low	Privacy policy, member contract, and call announcements updated.	Low
R8	LIA not documented	High	Mitigated	Low	LIA completed as separate document.	Low
R9	Incorrect AI advice	Med	Low	Low	Human advisor oversight. Escalation protocol in system prompt.	Low
R10	Vendor lock-in	Med	Low	Low	TJ owns KB, prompts, taxonomy. Data portable to any RAG system.	Low

## 4. Mitigations Summary

Measure	Detail
Human review of all AI outputs	Mandatory before any content enters the live knowledge base

Enterprise provider selection	SOC 2 Type II + UK GDPR DPA + no-training API terms required
Immediate raw data deletion	Enforced at application layer — no manual step
ZDR configuration	Enabled where available across all providers
Member opt-out right	Available at any time via <a href="mailto:dpo@wearetalentjourney.com">dpo@wearetalentjourney.com</a> — no service impact
Pre-upload guidance	Members instructed to redact third-party personal data
Full transparency	Privacy policy, member contract, call announcements all updated
Annual DPIA review	Reviewed annually and on any material change

## 5. DPO Consultation

Field	Detail
DPO name	Rob White
DPO email	<a href="mailto:dpo@wearetalentjourney.com">dpo@wearetalentjourney.com</a>
Date consulted	28.05.26
DPO opinion	No Objection Raised
DPO signature	<i>Robert White</i>

*ICO prior consultation: residual risks are Medium or Low after mitigation. Prior consultation not required at this stage. Review if residual risk level increases.*

## 6. Sign-Off

*Signing confirms: risks assessed, mitigations in place, processing approved to proceed. Legal prerequisite for live AI processing.*

Field	Detail
Name	Hugo Sugden
Title	Director, Talent Journey Operations Limited
Sign-off date	6.7.26
Signature	<i>Hugo Sugden</i>
Next review	May 2027 or on material change

## 7. Pre-Launch Checklist

#	Obligation	Done
1	DPIA signed by Hugo Sugden	<input type="checkbox"/>
2	LIA signed by Hugo Sugden and Rob White	<input type="checkbox"/>
3	Privacy policy published at <a href="https://wearetalentjourney.com/privacy-policy">wearetalentjourney.com/privacy-policy</a>	<input type="checkbox"/>
4	Cookie notice published at <a href="https://wearetalentjourney.com/cookies">wearetalentjourney.com/cookies</a>	<input type="checkbox"/>
5	Website T&Cs published at <a href="https://wearetalentjourney.com/terms-conditions">wearetalentjourney.com/terms-conditions</a>	<input type="checkbox"/>
6	Member contract amended and in use for new members	<input type="checkbox"/>
7	Call recording announcements updated for all session formats	<input type="checkbox"/>
8	DPA with The AI Guys signed by Hugo Sugden	<input type="checkbox"/>
9	DPAs confirmed with all AI language model providers	<input type="checkbox"/>
10	International transfer mechanisms documented for all US providers	<input type="checkbox"/>
11	ZDR confirmed or configured for all providers in use	<input type="checkbox"/>
12	Human review process for AI outputs documented and operational	<input type="checkbox"/>
13	Member opt-out mechanism operational	<input type="checkbox"/>
14	ICO registration confirmed	<input type="checkbox"/>