

Privacy Notice

How your information is collected, used and protected when you use the Companion at start.yourfirst60days.com, written in plain English.



Version 1.0
2 September 2026

The Companion only works if you can write honestly about the role you have just stepped into. This notice sets out exactly what happens to what you write, who can see it, where it is kept, and the choices you have. Every statement here describes the system as it actually runs.

1 Who is responsible for your data

The Transformation Agency Ltd is the data controller. It decides why and how your information is used. Registered in England and Wales, company number 06809367, registered office Premier House Units 1 and 2, Wainman Road, Peterborough, PE2 7BU. Privacy contact: tess@thetransformationagency.com.

Test Tube Marketing Ltd builds and operates the Companion on The Transformation Agency's behalf as its data processor, under a written data processing agreement. Registered in England and Wales, company number 15388084, registered office Suite 3a Holly Grange, Holly Lane, Balsall Common, Coventry, CV7 7EB. Operational and deletion requests: hello@testtubemarketing.com.

2 What this notice covers

This notice covers the Companion web application at start.yourfirst60days.com, including the request for access form, your account, everything you write inside the Companion, dictation, the emails the Companion sends you, and the option to register interest in working with The Transformation Agency's team. It does not cover The Transformation Agency's wider website, newsletters or coaching services, which have their own privacy information.

The promise in one line. What you write in the Companion is yours. Your employer cannot read it. The Transformation Agency and its team cannot read it. Test Tube Marketing, who built it, cannot read it in the ordinary course of operating the service. It is locked to your account at the database level, and you can delete all of it yourself at any time.

3 The information we collect

CATEGORY	WHAT IT IS	WHERE IT COMES FROM
Access request	Your name, work email address, organisation and the date your new role starts. The Companion also records the internet address (IP) the request came from and the time, so that automated abuse of the form can be limited.	You, when you request access.
Account details	Your email address, name, organisation, role start date, and an optional job title and profile photo if you choose to add them.	Carried over from your request, then anything you add on your account page.
Your content	Everything you write: your answers to prompts, weekly reflections, journal entries, percolation notes, check-in answers, and the people, notes and positions you put on your stakeholder map, team map and history map.	You, as you use the Companion.
Dictation	If you tap the microphone: a recording of your voice, which exists only for as long as it takes to turn it into text, and the resulting words. See section 7.	You, only when you choose to dictate.
Coaching interest	If you register interest in working with The Transformation Agency's team: the options you tick.	You, only when you choose to register interest.
Service records	Which reminder emails have been sent to you, a timestamp of when you last wrote something, and a count of how many times you used dictation. None of these record what you wrote.	Generated by the Companion as you use it.
Sign-in and security	The single-use sign-in links sent to your email address and the session that results, so the Companion knows it is you.	Generated when you sign in.
Usage statistics	Anonymous page view statistics (which pages are visited, from which country and on which kind of device). These use no cookies and cannot identify you.	Generated as pages load.

The Companion does not ask for, and does not need, any financial information, government identifiers or health information. It is not intended for anyone under 18.

The people you write about

Your maps and notes will often name colleagues: stakeholders, members of your team, people who shaped the history of the business. That is the point of the tool, and it is also personal information about them. It is held to exactly the same standard as everything else you write:

private to you, never disclosed to anyone by us, and deleted when you delete your account. We ask that you keep what you write about others factual and professional, as you would in your own notebook.

4 How we use your information, and the legal basis

PURPOSE	WHAT HAPPENS	LEGAL BASIS (UK GDPR)
Approving access	Your request is reviewed by The Transformation Agency, who decide whether to grant you access as a reader of the book. The people who review requests are notified by email.	Steps taken at your request before entering into a contract.
Running the Companion	Storing your content, showing you the right week, building your maps and journal, and letting you export the whole 60 days as a document.	Performance of a contract with you.
Dictation and tidy-up	Turning your recording into text, and, only if you ask, tidying that text.	Performance of a contract with you. You choose whether to use it each time.
Reminder emails	A short email at points in your 60 days encouraging you to return, sent from hello@yourfirst60days.com . Every one carries a link to turn them off, and the setting lives on your account page.	Legitimate interests: helping you get value from a tool you asked to use. You can switch them off at any time.
Keeping a record of readers	Your name, email address, organisation and start date are recorded in The Transformation Agency's customer records system (Keap), tagged to show that you requested and were granted access to the Companion, and, if you register interest, which coaching options you chose. Nothing you write is ever sent there.	Legitimate interests of The Transformation Agency in knowing who its readers are and administering access.
Coaching interest	If you register interest, The Transformation Agency's team receive your name, email address, organisation and the options you ticked, so they can get in touch. Never your content.	Steps taken at your request. You decide whether to do this.
Security and fair use	Limiting repeated requests from one internet address, blocking automated form submissions, and capping how much dictation any one account can use.	Legitimate interests in keeping the service secure and available.
Understanding use of the service	Anonymous, aggregated page statistics and reader counts, such as how many readers were active this week. No individual reader's activity or content is ever reported to anyone.	Legitimate interests in improving the Companion.

We do not use your information for advertising, we do not sell it, and we do not use anything you write to train artificial intelligence models.

5 Who can see what

- **Your content:** only you. Every table that holds reader content enforces "your own rows only" inside the database itself, not just in the application. There is no administration screen that shows anyone's content, and no report that is built from it.
- **Your account and request details:** The Transformation Agency's authorised administrators can see the list of readers: name, email address, organisation, start date and when each reader last wrote something. They use this to approve access and to see how many readers are active.
- **Test Tube Marketing:** as processor, its engineers hold the technical access needed to build, run and support the Companion. That access is limited to the people who operate the service, is covered by the data processing agreement and confidentiality obligations, and is not used to browse reader content.
- **Your employer:** nothing. The Companion has no organisational view, no manager view and no reporting to anyone at your company.

6 Where your information is held, and who helps us run the service

Your content and account details are held in a dedicated database in London, United Kingdom, hosted by Supabase on Amazon Web Services in the eu-west-2 region. In normal use nothing you write leaves the UK. The two exceptions are dictation, which is processed in the European Union, and your basic account details in Keap, which are stored in the United States. Both are explained below.

PROVIDER	WHAT THEY DO FOR US	WHAT THEY RECEIVE	WHERE
Supabase	Database, sign-in and file storage	Everything held in the Companion	United Kingdom (AWS London)
Vercel	Hosting and delivery of the application; anonymous page statistics	The application code and the pages served to you; anonymous usage data	Global content delivery; data stored in the UK database
Resend	Sending sign-in links, reminder emails and notifications	Your email address, your name and the email itself	Email delivery service
AssemblyAI	Speech-to-text for dictation, and text tidy-up when you ask for it	Your recording, or the transcribed text, and nothing that identifies you	European Union (AssemblyAI's EU service)
Keap (Thryv, Inc.)	The Transformation Agency's customer records system	Your name, email address, organisation, start date and Companion tags. Never your content.	United States, under Standard Contractual Clauses

Each of these providers is bound by contract to process your information only on our instructions and to protect it. Where information leaves the United Kingdom, it does so under safeguards recognised by UK data protection law.

7 Dictation, in detail

Dictation is optional. Typing works everywhere the microphone does, and the Companion never asks for the microphone unless you tap to record. When you do, this is exactly what happens:

- Your device records the audio and uploads it straight into private storage in London that only your account can reach.
- The Companion hands AssemblyAI a link to that recording which expires after fifteen minutes. The audio does not pass through any other server of ours.
- AssemblyAI's European service turns the audio into text and returns it. They receive the audio and nothing else: not your name, email address or anything about you.
- The recording is deleted from our storage the moment transcription finishes, whether it succeeded or failed. We do not keep voice recordings.
- At the same moment we ask AssemblyAI to delete their copy of the transcript. Under their published retention policy, audio held in their systems is removed within 24 to 48 hours; we cannot shorten that window.
- AssemblyAI's agreement with us prevents them from keeping, using or sharing your recording or transcript for any purpose other than the transcription we asked for, and our account is set so that nothing of yours is used to train or improve their models.
- The words land in your writing box, editable, and are stored as your own content under the same terms as everything else you write.

"Tidy this up"

Dictation gives you your words exactly as you said them, fillers and all. If you tap "Tidy this up", the text (never the recording) is sent to a language model through AssemblyAI's European service. It punctuates and removes the ums, and it is instructed never to change your meaning, reverse a negation, soften a hedge, or alter a name or number. Your original words are kept, "Put my words back" restores them at any point, and if the tidied version comes back much shorter than what you said, the Companion refuses it rather than hand you a summary.

8 How long we keep your information

INFORMATION	KEPT FOR
Your content and account	For as long as your account exists. When you delete your account, all of it is removed immediately and permanently, and no copy is kept from which it could be restored.
Voice recordings	Seconds: deleted as soon as each one has been transcribed.
Access requests that are declined or never approved	Up to 12 months from the request, so that repeat requests can be recognised, then deleted.

Service records (emails sent, last activity, dictation counts)	Removed with your account.
Your details in Keap	Held by The Transformation Agency under its customer records retention practice. Ask at the privacy contact above to have them removed.
Anonymous usage statistics	Cannot identify you; kept in aggregate.
Exports you download	The document is yours, on your device. We keep no copy of it.

9 How your information is protected

- **Locked to you in the database.** Row-level security on every reader table means the database itself refuses to return anyone else's content, even if the application had a bug.
- **No passwords.** You sign in with a single-use link sent to your email address. There is no password to leak, reuse or phish.
- **Encrypted in transit and at rest.** Every connection uses TLS, and the database and file storage are encrypted at rest by the hosting provider.
- **Limited access.** Production access is restricted to the Test Tube Marketing engineers who operate the service.
- **Abuse controls.** The request form carries automated protection against bots and repeated submissions, and dictation has per-reader and service-wide limits.

A note about work devices. If you use the Companion on a company device or network, your company's own monitoring tools sit outside our control and outside this notice. If that concerns you, use a personal device.

10 Cookies and local storage

The Companion sets only the cookies needed to keep you signed in. It stores one small flag in your browser so that the privacy note on arrival is not shown on every visit. The page statistics we use do not set cookies and do not identify you. There are no advertising or tracking cookies.

11 Your rights

Under UK data protection law you have the right to:

- **Access** the personal information we hold about you. Everything you have written is already visible to you inside the Companion, and the export gives you all of it as a single document.
- **Correct** anything that is wrong. Your account details can be edited on your account page.
- **Delete** everything. There is a "Delete my account" button at the foot of your account page. It removes your reflections, journal, maps, history wall, every answer and your sign-in itself, immediately. If you would rather someone did it for you, email hello@testtubemarketing.com and it will be done within 7 days.

- **Take your data with you.** The export gives you your whole 60 days in a portable document.
- **Object** to processing based on legitimate interests, including reminder emails, which you can switch off on your account page.
- **Restrict** processing in certain circumstances, and to **withdraw** from optional features, such as dictation, simply by not using them.

To exercise any of these rights, contact The Transformation Agency at tess@thetransformationagency.com or Test Tube Marketing at hello@testtubemarketing.com. We will respond within one month. You also have the right to complain to the Information Commissioner's Office at ico.org.uk or on 0303 123 1113, though we would welcome the chance to resolve any concern with you first.

12 Changes to this notice

If the way the Companion handles your information changes in a way that matters, this notice will be updated and the version number and date above will change. The current version is always available from the privacy page inside the Companion and from the sign-in page.

Your First 60 Days Companion Privacy Notice, version 1.0, 2 September 2026. Controller: The Transformation Agency Ltd (06809367). Processor: Test Tube Marketing Ltd (15388084).

This version is published pending independent legal review. Every factual statement in it has been checked against the running service on the date above.