

# TeleSeal Privacy Policy

**Version:** 1.0

**Effective Date:** 2025-08-25

**Review Cycle:** Annual

**Owner:** Chief Information Security Officer (CISO)

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## 1. Purpose

This Privacy Policy describes how TeleSeal collects, uses, stores, and protects personal data in connection with Remote Online Notarization (“RON”) services. It ensures compliance with Arizona RON regulations and applicable data protection laws.

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## 2. Scope

This Policy applies to:

- **Clients/Signers** providing personal and identity information.
  - **Notaries** providing commission details and certificates.
  - **Vendors** processing data on behalf of TeleSeal.
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## 3. Data Collected

- **Identity Information:** Government-issued ID images, KBA responses, face captures.
  - **Session Data:** Audio/video recordings, electronic journal entries, IP addresses.
  - **Notarial Data:** X.509 certificates, digital seals, commission details.
  - **Operational Data:** Logs, device/browser details, support tickets.
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## 4. Use of Data

TeleSeal uses personal data to:

- Verify user identity and prevent fraud.
  - Facilitate lawful notarization sessions.
  - Generate and secure required records (journal, A/V, certificates).
  - Comply with legal and regulatory requirements.
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## 5. Data Sharing

TeleSeal may share data with:

- **Notaries** for lawful performance of notarial acts.
- **Vendors** (Authenticate.com, Twilio, AWS) under strict contractual security obligations.
- **Regulators or Courts** when required by law.

TeleSeal does not sell or rent personal data.

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## 6. Data Protection

- **Encryption:** All sensitive data encrypted in transit and at rest.
  - **Access Controls:** MFA and RBAC enforced for staff and vendors.
  - **Retention:** Journals and A/V retained for minimum statutory periods (5–7 years).
  - **Monitoring:** Logs and integrity checks maintained per Information Security Policy.
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## 7. User Rights

Depending on applicable law, users may:

- Access their personal data.
  - Request corrections or updates.
  - Request deletion after legal retention requirements are met.
  - File complaints with regulators.
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## 8. Breach Notification

In the event of a breach, TeleSeal will notify affected users and regulators without unreasonable delay, consistent with our Incident Response Policy.

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## 9. Exceptions

Exceptions to this Policy must be documented, approved by the CISO, and accompanied by compensating controls.

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## 10. Updates

TeleSeal may update this Privacy Policy. Material changes will be communicated via email or portal notice.