

SWIVEL SECURE LIMITED – PRIVACY NOTICE (ANDROID) – 2026

VERSION: 2.0 (April 2026)

OWNER: Data Protection Officer (DPO)

SCOPE: Global (GDPR UK/EU, CCPA/CPRA,)

1. SCOPE AND RESPONSIBILITIES

This Privacy Notice applies to all data subjects whose personal data is collected or processed through the **AuthControl Mobile (Android)** application. Swivel Secure Limited ("Swivel") acts as a **Data Processor** on behalf of your organisation (the "Data Controller").

The Swivel Data Protection Officer is responsible for ensuring this notice is maintained and reflects current processing activities.

2. DATA PROCESSING PARTICULARS

The AuthControl Mobile App is a security tool designed to provide intelligent authentication. The categories of data processed include:

Data Category	Purpose	Storage Location
Device Identifier	To bind the security token to a specific hardware device.	Encrypted on Device / Swivel Server
Authentication Keys	To generate One-Time Passwords (OTPs).	Secure Enclave (Device Only)
Push Tokens	To facilitate Push Notifications for authentication requests.	Google Firebase / Swivel Server
Biometric Metadata	To unlock the app via Fingerprint/Face ID.	Local Device Only (Swivel never accesses raw biometrics)

3. AUTHCONTROL SOLUTIONS (ANDROID)

The app utilises three primary modes of authentication:

- **AMS (Authentication Message Service):** Processes a security string sent via push notification to generate an OTP.
- **AMM (Authentication Mobile Message):** Displays a security string within the app interface for manual entry.
- **AMA (Authentication Mobile App):** A fully automated one-touch authentication process utilising push technology.

4. BIOMETRICS AND SECURITY

4.1 Biometric Data: The AuthControl app utilises the Android BiometricPrompt API. Swivel Secure

does not collect, store, or transmit your raw biometric templates. All biometric matching is performed by the Android operating system locally.

4.2 Security Updates: Swivel commits to providing security updates for this application for a minimum of 5 years from the release of the version installed.

4.3 Vulnerability Disclosure: Security flaws can be reported via our secure portal at [Swivel Support Portal].

5. DISCLOSURE AND INTERNATIONAL TRANSFERS

We do not sell your personal data. Data is only shared with third parties (such as Google Firebase) as strictly necessary to provide the authentication service. All international transfers are protected by Standard Contractual Clauses (SCCs) or the UK International Data Transfer Agreement (IDTA).

6. YOUR RIGHTS AND CONTACT INFORMATION

You have the right to access, rectify, or erase your data as held by your Data Controller. Because Swivel acts as a Data Processor, to request the deletion of your AuthControl account or associated personal data, you must contact your organisation's IT helpdesk (the Data Controller). Swivel will promptly execute any deletion instructions received from your organisation. For users in the United States, services are distributed by Swivel Secure Inc. (Delaware), acting as a sub-processor to Swivel Secure Limited. For queries regarding how Swivel Secure processes data on behalf of your organisation, contact:

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