

SENECTA PRIVACY POLICY

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Senecta, Inc. ("**Senecta**", "we", "us") builds an ambient monitoring system installed in private homes and supplied to home care agencies. Senecta sensors combine radar and acoustic sensing. **They contain no camera and capture no images or video.** This policy explains what personal information we handle, why, and what rights you have.

It covers our website at senecta.ai, the Senecta applications and dashboards, and the Senecta sensors themselves.

If you are a resident in a home where a Senecta sensor is installed, or a family member, the section "Information from Senecta sensors" and the section "Your rights" are the ones that concern you most. The care agency that installed the system decides what happens with that information, and we handle it on their instructions.

1. Our role: when we decide, and when the agency decides

Our responsibilities differ depending on the information.

We act on the agency's instructions (processor / service provider) for everything the sensors collect in a home and everything derived from it. The care agency decides why the system is installed, who sees the information, and when it is deleted. We process it to provide the service and for nothing else. Our **Data Processing Addendum** governs this.

We decide ourselves (business / controller) for the information we need to run Senecta as a company: website visitors, sales enquiries, account administration, billing, security logging, and our own legal compliance.

2. Information from Senecta sensor devices

Senecta sensors are installed in a resident's home with the agency's client. The system collects:

Radar sensing data. Senecta sensors use radar, meaning radio frequency sensing, to detect movement, presence, and position within a room. Radar produces no images, video, or visual representation of any person. **Senecta sensors contain no camera.**

Ambient audio. Senecta sensors pick up sound in order to detect patterns such as coughing. **The audio is analysed automatically by software. No person listens to it: not the care agency, not Senecta staff, and not any third party.** Only the patterns the software identifies are made available through the service.

Derived insights. These are the outputs the agency actually sees, and include changes in movement patterns, cough frequency trends, levels of vocalisation and conversation activity, and bathroom-visit frequency.

Residence and resident identifiers supplied by the agency, such as an address and a client reference.

We treat these insights as **consumer health data** under the Washington My Health My Data Act and equivalent state laws, and as **sensitive personal information** under the California Consumer Privacy Act.

People other than the resident. Household members, visitors, and caregivers attending the home may be picked up incidentally by the sensors. The agency is responsible for giving notice to those people and for obtaining any consent the law requires, including under state wiretapping and all-party consent laws.

3. Information we collect directly

Account information. Name, work email, job title, and login credentials for authorised users of the dashboard.

Billing information. Company details and billing contacts. Card and bank details are handled by our payment processor and are not stored by us.

Enquiries. Anything you send us by email or through a form on our website.

Technical data. IP address, browser and device type, pages viewed, and similar telemetry from our website and applications, used for security, diagnostics, and understanding how the product is used.

4. Why we use information

- to provide, operate, secure, and support the Senecta service
- to detect events and generate insights for the care agency, by analysing radar and acoustic data automatically
- to deliver alerts, dashboards, and reports to authorised users
- to administer accounts, take payment, and provide customer support
- to investigate security incidents and prevent misuse
- to improve the service and to develop, train, and improve the models behind it, using de-identified and aggregated data only
- to comply with our legal obligations and to establish or defend legal claims

5. What we do not do

We do not sell personal information, and we do not share it for cross-context behavioural advertising or targeted advertising. We have not done so in the preceding twelve months.

We do not use information from Senecta sensor devices for advertising, profiling unrelated to care, or any purpose the agency has not instructed.

We do not make raw audio available to anyone.

6. Who we share information with

The care agency that installed the system, and the users it authorises.

Service providers who help us run the service, under written terms restricting what they may do. These fall into five categories: cloud hosting and storage, payment processing, email and application messaging, error monitoring and application telemetry, and product and website analytics. A current list naming each provider is available on request.

All of our service providers process information within the United States. Our production infrastructure is located in Hillsboro, Oregon.

Legal and corporate. We may disclose information where required by law, to protect our rights or the safety of others, or in connection with a merger, acquisition, or sale of assets, in which case we will give notice.

7. De-identified and aggregated data

We create de-identified and aggregated data from the information we hold, and we use it to improve the service and to train the models behind Senecta's detection. We may keep and use that data indefinitely, including after a customer stops using the service.

We take reasonable measures to ensure de-identified data cannot be linked back to any individual or household, we commit to keeping it in de-identified form, we do not attempt to re-identify it, and we require the same of anyone who receives it. We do not use it to contact, profile, or make decisions about any individual.

8. How long we keep information

While a home is active on the service, we keep its history so the system can identify changes over time. That history is what makes the insights meaningful.

When a customer's agreement ends, we delete or return the personal information within thirty days, except where the law requires us to keep it. Copies held in backups are deleted on our ordinary backup cycle, within thirty-five days, and are not used for anything in the meantime.

Account, billing, and correspondence records are kept for as long as needed for our business and legal purposes.

9. Security

We maintain administrative, physical, and technical safeguards appropriate to the information we hold, including encryption in transit and at rest, role-based access control with least privilege, and logging of access to resident information.

Senecta does not currently hold SOC 2 or ISO 27001 certification. We are working toward SOC 2 Type II. We complete customer security questionnaires on request and can provide a written description of our controls.

No system is completely secure. If we become aware of a breach affecting personal information, we will notify the affected customer without undue delay and within seventy-two hours, and will cooperate with any notifications they must make.

10. Your rights

Depending on where you live, you may have the right to:

- know what personal information we hold about you and why
- get a copy of it in a portable format
- correct inaccurate information
- delete it
- limit the use of sensitive personal information
- opt out of sale or sharing (we do neither)

- withdraw consent, where processing is based on consent
- appeal a decision we make about your request
- not be discriminated against for exercising any of these rights

If a Senecta sensor is installed in your home, or you live or work in a home where it is installed, the care agency holds the relationship with you and decides what happens with the information. The quickest route is to contact that agency. You can also contact us at mauro@senecta.ai and we will pass your request to them and support them in answering it, as we are required to do.

Withdrawing consent. If you no longer want the system operating in your home, tell the care agency. They are required to deactivate and remove the equipment promptly, and doing so will not affect your eligibility for care services.

To make a request directly to us, email mauro@senecta.ai with enough detail for us to identify your information. We will verify your identity before acting, will respond within forty-five days, and may extend once where the law allows. An authorised agent may act on your behalf with proof of authority. If we decline, we will explain why and you may appeal by replying to our response. If you are not satisfied, you may complain to your state Attorney General.

11. State-specific information

California. The categories of personal information we collect, our purposes, and the categories of recipients are set out in Sections 2, 3, 4, and 6 above. We collect sensitive personal information in the form of health-related insights, and we use it only to provide the service and for the purposes permitted under the CCPA. We do not sell or share personal information. California residents have the rights listed in Section 10, including the right to limit the use of sensitive personal information.

Washington, Nevada, and other consumer health data laws. The insights the system produces are consumer health data. We collect them on the instruction of the care agency, which is responsible for obtaining the consent those laws require. We do not sell consumer health data, and we would not do so without the separate written authorisation those laws require.

Other states with comprehensive privacy laws. Residents of those states have the rights described in Section 10, exercisable in the same way.

12. Children

The Senecta system is intended for use in the homes of adults receiving care. Our website and applications are not directed to children, and we do not knowingly collect personal information from anyone under 18 through them. If you believe a child's information has reached us, contact mauro@senecta.ai and we will delete it.

13. Cookies and website analytics

Our website and dashboard use cookies and similar technologies that are necessary for them to function, together with analytics that help us understand how they are used. We use **PostHog** for product analytics and **Fathom Analytics** for website analytics. Fathom does not track visitors across sites and does not build advertising profiles. Where required, we ask for consent before setting non-essential cookies, and you can decline without losing access to the site. You can also control cookies through your browser settings. We do not use advertising cookies or third-party tracking for targeted advertising.

14. Changes to this policy

We may update this policy. We will change the date at the top, and where the change is material we will give notice through the service or by email before it takes effect.

15. Contact us

Senecta, Inc.

625 2nd Street, San Francisco, CA 94107, United States

mauro@senecta.ai

For privacy questions, data rights requests, and appeals, use the same address and mark your message "Privacy request".