DRAFT — prepared without legal advice — must be reviewed by a qualified solicitor before use

Strata Privacy Policy

Version 2026-10-03-draft
Effective 2026-10-03
Provider Racelogic Limited (company no. 02743719)

In plain terms. We collect what we need to run Strata: your account, your organisation's devices and streams, and billing details held by Stripe. We do not sell your data, show you adverts, or use analytics or tracking cookies. Footage you stream belongs to you; we process it only to deliver, record and analyse it as your settings say, and it is deleted on the schedule below. You can download or delete your own data from the dashboard without asking us.

1. Who we are

1. This notice explains how Racelogic Limited ("**Racelogic**", "**we**") handles personal data in connection with Strata: the website at strata.stream, the dashboard, the Strata software on encoders and other devices, and our receivers and relays.
2. For the personal data described in section 3 we are the **controller**. Contact us about anything in this notice at `privacy@strata.stream`, or write to Racelogic Limited, Unit 10, Swan Business Centre, Osier Way, Buckingham, MK18 1TB, United Kingdom.
3. **Data protection officer.** [To be completed: confirm whether Racelogic has appointed a data protection officer; if so, give their contact details here].
4. **EU representative.** Because we are established in the United Kingdom and offer Strata to people in the European Union, our representative in the EU under Article 27 of the EU GDPR is [To be completed: name and address of the EU Article 27 representative (not yet appointed)].

2. Footage and other content: when we act for you

1. When you stream with Strata, the video and audio you send, the recordings we make of it, and the telemetry and logs of each run may contain personal data about the people who appear in or are heard in the footage.
2. If you use Strata for a business, **your organisation is the controller** of that content and we are its **processor**. We process it only on your organisation's instructions, as set out in our Data Processing Addendum. Questions about footage that a Strata customer has recorded should go to that customer; if you send them to us, we will pass them on.
3. If you use Strata as a consumer, we process your content only to provide the Service to you, as your settings say, and on the retention schedule in section 6.

3. What we collect, why, and on what basis

UK and EU data protection law requires us to have a lawful basis for each use of personal data. Ours are: **contract** (we need it to provide Strata to you), **legitimate interests** (we need it to run Strata securely and reliably, and those interests are not outweighed by yours), **legal obligation** (the law requires it) and **consent** (you chose to give it). Section 6 says how long we keep each kind of data.

Data	Source	Why we use it	Lawful basis
Account: email address, password hash (we never store your password itself), whether your email is verified, when you joined and last signed in	You	To create and secure your account, sign you in, and send you service emails (verification, password reset, security notices)	Contract
Linked sign-in providers: the provider (for example Google), your account ID there, and the email address it reports	The provider, when you choose to link it	To let you sign in with that provider	Contract
Sessions: IP address, browser user agent, when the session was created and last used	Your browser	To keep you signed in, show you where you are signed in, and detect misuse	Contract; legitimate interests (security)
Organisations, memberships and invitations: organisation name, members and their roles, the email address an invitation was sent to and who sent it	You or your organisation's admin	To run shared organisations and let admins manage access	Contract; for people invited, the legitimate interests of the organisation inviting them
Legal acceptances: which version of which document you accepted, when, and where (sign-up, prompt or checkout)	You	To show what you agreed to, and when	Legal obligation; legitimate interests (proving the contract)
Activity log: security-relevant actions (such as sign-ins, exports, deletions and changes to members or settings), when, by whom, and from which IP address	Generated by Strata	To let you and your admins see what happened on your account, and to investigate security incidents	Legitimate interests (security and accountability)
Devices: encoder and receiver names, hostnames, device keys, software versions, network interfaces and their IP addresses, mobile network operator, signal	Your devices	To run streams, show device health in the dashboard, and diagnose problems	Contract; legitimate interests (reliability)

Data	Source	Why we use it	Lawful basis
measurements, and cell identifiers (cell ID, eNodeB ID, band)			
Stream and run telemetry: when streams started and ended, bitrates, link statistics, events, quality scores and device logs	Your devices and our receivers	To deliver streams, show you how they performed, and improve Strata	Contract; legitimate interests (improving the Service)
Destinations: names and URLs of the places you stream to, and stream keys (stored encrypted)	You	To deliver your streams where you ask	Contract
YouTube connection: channel ID and title, and the access tokens Google issues (stored encrypted)	Google, when you connect a channel	To create and manage live broadcasts on your channel when you ask us to	Contract
Billing: plan, number of seats, billing period, subscription status, currency, your Stripe customer ID, and usage in stream-minutes	You, Stripe and Strata	To charge for the Service, enforce your plan and spend cap, and send usage notices	Contract; legal obligation (tax records)
Emails we send you: recipient, subject and content, and delivery status	Generated by Strata	To deliver service emails reliably	Contract
Correspondence: what you send to our support, billing, privacy, legal or abuse addresses	You	To answer you and keep a record of what was agreed	Legitimate interests; legal obligation where a request concerns your rights
Server logs and packet captures: IP addresses, request paths, times and user agents; short packet captures of encrypted stream traffic	Your browser and devices	To keep Strata secure and to diagnose network problems	Legitimate interests (security and reliability)

1. **Card details.** Stripe collects your card or other payment details directly. We never see or store them.

2. **Cell identifiers.** The cell ID and eNodeB ID your modems report can indicate roughly where a device was when it streamed. We collect them to understand the mobile networks your streams use, not to locate you, and they are kept with the run on the schedule in section 6.
3. **Modem settings pages.** If you open a modem's own settings page through the dashboard, we relay the traffic between your browser and the modem. We do not store what passes through.
4. **Google user data.** When you connect a YouTube channel, Strata's use of information received from Google APIs adheres to the Google API Services User Data Policy, including the Limited Use requirements. We use it only to create and manage broadcasts you ask for, we do not transfer it to anyone else except as needed to provide that, and no person at Racelogic reads it unless you ask us to for support or the law requires it. You can disconnect the channel in Strata, or revoke our access at myaccount.google.com/permissions.
5. **No selling, no advertising, no profiling.** We do not sell or rent personal data, share it for cross-context behavioural advertising, or build advertising profiles. We use no analytics or advertising cookies (see Cookies and Local Storage).
6. **No automated decisions.** We do not make decisions about you based solely on automated processing that have legal or similarly significant effects. The automatic checks Strata does run, such as declining to start a new stream when your organisation has reached its spend cap, apply your plan and the settings your admins chose.
7. **If you do not give us data.** Most of the data above is needed to provide Strata. Without an email address we cannot create an account, and without device telemetry we cannot run a stream.

4. Who we share it with

1. **Service providers (processors)** that host and operate Strata for us, under contracts that require them to protect the data and use it only on our instructions. They are listed, with what they do and where, in Sub-processors.
2. **Stripe** processes payments as an independent controller, under its own privacy policy.
3. **Google** acts as an independent controller when you sign in with Google or connect a YouTube channel, under the Google Privacy Policy.
4. **The destinations you choose.** When you stream to YouTube or another destination, we send your stream there because you asked us to; the operator of that destination handles it under its own terms.
5. **Other members of your organisation** can see the organisation's devices, streams and recordings according to their role, and admins can see its members.
6. **Authorities and others where the law requires**, or where it is needed to establish or defend legal claims, prevent fraud, or protect anyone's safety.
7. **A buyer of the business.** If Strata or Racelogic is sold or reorganised, personal data may transfer to the new owner, who must continue to protect it as this notice describes.

5. International transfers

1. We are based in the United Kingdom. Strata's servers are in the European Economic Area (Germany and Finland) [To be completed: update if Strata moves to Google Cloud's London region], which the UK recognises as providing adequate protection. Personal data of people in the EU is transferred to the UK under the European Commission's adequacy decision for the UK.
2. Some of our service providers are in, or may access data from, the United States or other countries. Where those countries are not recognised as adequate, we protect the transfer with:

- the **EU–US Data Privacy Framework** and its **UK Extension**, where the provider is certified under it; or otherwise
- the **EU Standard Contractual Clauses**, together with the **UK Addendum** to them, or the **UK International Data Transfer Agreement** (IDTA).

Sub-processors says which mechanism applies to each provider. Contact `privacy@strata.stream` for a copy of the relevant safeguards.

6. How long we keep it

Data	How long we keep it
Account (email, password hash, linked sign-in providers)	Until you delete your account
Sessions (IP address, user agent)	30 days after the session expires or is signed out. A session lasts at most 30 days from its last use
Invitations	30 days after the invitation expires or is accepted
Emails we send	The content is deleted as soon as the email is sent; the record that it was sent is deleted after 30 days
One-time email links (verification and password reset)	Only a hash is stored; a verification link expires after 24 hours and a reset link after 1 hour, and the record is then deleted
Activity log	12 months. When a user is deleted, their email address is removed from the entries that remain
Legal acceptances	Until the account is deleted [To be completed: counsel to confirm whether acceptance records should be kept for the limitation period after deletion]
Runs: footage, telemetry, logs, events, quality scores and stream configuration	Your organisation's retention period: your plan's maximum (7, 30, 90 or 365 days) or a shorter period an admin chooses. Nothing is recorded while recording is turned off
Packet captures	7 days at most
Devices and destinations	Until they are removed, or the organisation is deleted
Usage records (stream-minutes per organisation)	6 years, to meet UK tax law. They contain the organisation ID and no personal data [To be completed: confirm the EU OSS record-keeping period (10 years) for EU consumer sales]
Stripe customer and invoices	Kept by Stripe, as an independent controller, for its own legal obligations. We cancel the subscription when the organisation is deleted
Correspondence	[To be completed: retention period for support and other correspondence, for example 3 years after the matter is closed]
Server logs	30 days
Encrypted database backups	35 days. Data you delete disappears from backups as they roll over

7. Your rights, and how to use them

You have the following rights over your personal data. You can use most of them yourself in the dashboard, straight away and without asking us.

Right	How to use it
See your data and take a copy (access and portability)	Account → **Download my data** gives you a machine-readable (JSON) file of your account, sessions, linked sign-ins, legal acceptances and activity. An organisation admin can download the organisation's data from Organisation → **Export organisation data**, and download any recording from the Runs page
Correct it (rectification)	Change your password on the Account page, and names and settings where they appear. To change the email address on your account, or for anything else, email `privacy@strata.stream`
Delete it (erasure)	Account → **Delete my account**. If you are the only admin of an organisation that has other members, you must first make someone else an admin or delete the organisation. An admin can delete the whole organisation; an admin or operator can delete any recording, or all recordings at once
Limit what we record (restriction and objection)	An admin can turn recording off, or shorten how long recordings are kept, under Organisation → **Recording & retention**. To object to any other processing based on legitimate interests, email `privacy@strata.stream`
See where you are signed in	Account → **Sessions** lists each session with its IP address and browser, and lets you sign any of them out
See what has happened on your account	Account → **Activity** shows the activity log
Withdraw consent	Where we rely on consent, you can withdraw it at any time, for example by disconnecting a YouTube channel or unlinking a sign-in provider

1. You can also make any request by emailing `privacy@strata.stream`. We will answer within one month, may ask you to confirm your identity, and will not charge you unless a request is manifestly unfounded or excessive.
2. If you are a member of an organisation, its admins control the organisation's data (its devices, streams and recordings). Deleting your account removes you from the organisation but does not delete the organisation's recordings.

8. Complaints

1. Please tell us first at `privacy@strata.stream` and we will try to put things right.
2. You have the right to complain to a data protection supervisory authority:
   - in the UK, the **Information Commissioner's Office**: ico.org.uk/make-a-complaint, 0303 123 1113;
   - in the EU, the supervisory authority of the country where you live or work, or where you think the problem happened. The European Data Protection Board lists them at edpb.europa.eu.

9. For people in the United States

1. We do not sell personal information or share it for cross-context behavioural advertising, and we have not done so in the past 12 months. We do not use or disclose sensitive personal information to infer characteristics about you.
2. The categories of personal information we collect, their sources, why we use them and who we disclose them to are set out in sections 3 and 4. In the terms of US state privacy laws they are identifiers (such as email and IP address), commercial information (your plan and usage), internet or network activity (sessions, logs, device telemetry), and approximate location derived from cell identifiers.
3. Depending on the state you live in, you may have the right to know what personal information we hold about you, to get a copy, to have it corrected or deleted, and not to be discriminated against for using these rights. Use them as described in section 7, or by emailing `privacy@strata.stream`. An authorised agent may make a request for you; we may ask them for proof of authority and ask you to confirm your identity. If we refuse a request, you can appeal by replying to our answer.

10. Children

Strata is not directed at children. You must be 18 or over to have an account. If you believe a child has given us personal data, contact `privacy@strata.stream` and we will delete it.

11. Cookies and local storage

We use one strictly necessary cookie, to keep you signed in, and store a few display preferences in your browser. We use no analytics, advertising or tracking cookies, so we do not show a cookie banner. Details are in Cookies and Local Storage.

12. Security

We protect personal data with measures that include encryption in transit (TLS) for the website, dashboard and device connections, encryption of every stream between encoder and receiver, encryption of stream keys and access tokens at rest, Argon2id password hashing, encrypted backups, separation of each organisation's data, and an activity log of security-relevant actions. Racelogic staff have no access through Strata to customers' footage, recordings or devices. The Data Processing Addendum describes these measures in more detail.

13. Changes to this notice

We will update this notice when our practices change. Each version has a version number and an effective date. If a change is significant we will tell you by email or in the dashboard before it takes effect.

Racelogic Limited, a company registered in England and Wales under company number 02743719. Registered office: Unit 10, Swan Business Centre, Osier Way, Buckingham, MK18 1TB, United Kingdom. VAT number: [To be completed: UK VAT registration number].