Hidden Tokens in the United Kingdom: AI, the UK GDPR and professional confidentiality

Your teams use Copilot, ChatGPT or Claude on client files, whether you are a firm of solicitors, an accountancy practice or an SME. Hidden Tokens codes names, companies and identifiers **on your computer**, before the AI reads the file, and puts the real values back into the result, on your side.

Updated 27 October 2026

Why the question arises

- **The UK GDPR and the Data Protection Act 2018** require security of processing and data protection by design; the ICO has published guidance on AI and data protection.
- **AI providers are mostly American.** Transfers to the United States rely on the UK-US data bridge (in force since 12 October 2023) or other safeguards; a coded file reduces what leaves.
- **Professional confidentiality**: paragraph 6.3 of the SRA Code of Conduct requires solicitors to keep their clients' affairs confidential; the ICAEW Code of Ethics sets the same principle for accountants; the common law duty of confidentiality and the Caldicott Principles apply in health and care.

What the texts say, and what Hidden Tokens does

Text	What it requires	What Hidden Tokens does
UK GDPR, arts. 4(5), 25 and 32	Pseudonymisation, data protection by default, security	Coding by default on the computer; key kept separately, never transmitted
UK GDPR, art. 35	A data protection impact assessment (DPIA) for high-risk processing	DPIA template provided (in French for now)
UK GDPR, chapter V	Safeguards for transfers outside the UK	The AI provider receives only codes
SRA Code of Conduct, 6.3; ICAEW Code of Ethics	Confidentiality of the client's affairs	Local proof of what the AI received; a seal your client can verify

What Hidden Tokens recognises today, and what is missing

We tested the engine on a fictitious British letter on 27 October 2026. Here is what it found, as it stands:

`CODED` Names, addresses and postcodes, email addresses, company numbers (Companies House), passports, driving licences.

`CODED, BUT UNDER THE WRONG TYPE` The NHS number (treated as a phone number).

`NOT COVERED YET` The sort code and account number, UK mobile numbers (07…), part of the National Insurance number. English is sometimes over-coded ("National Insurance" taken for a name).

Until the UK identifiers pack ships, we offer UK organisations the pilot only, and say so, and we add these formats (sort code, account number, UK mobile numbers, NI number) to your organisation's policy as pattern rules, so they are always coded.

Prices (excl. VAT)

Solo, 1 seat	Firm, 2 to 20 seats	Organisation, 21 to 100 seats	101 to 500 seats
£339 / year	£249 / seat / year	£165 / seat / year £4,250 minimum	£120 / seat / year

For the first ten customers in the UK on the Firm or Organisation plan: one day of on-site rollout free (travel costs extra).

Until our online checkout takes pounds, UK orders are invoiced by us at these prices. 14-day trial, no account, no card.

What Hidden Tokens doesn't cover yet in the UK

- The UK identifiers pack (see above).
- UK identifiers in the leak scanner: it works in English, but counts sort codes, UK mobiles and NI numbers only once the UK pack ships.
- The licence agreement, the framework agreement and the DPIA template in English.

And, as everywhere: Hidden Tokens supports your compliance; it doesn't certify it. It protects what goes through it: text pasted by hand into the chat isn't covered.

This sheet is not legal advice: the references should be confirmed by your counsel or your DPO. Hidden Tokens · hiddentokens.com · info@hiddentokens.com · WhatsApp +212 680 092 567

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