



Data Flow and Data Handling Summary

v3.0 · Reviewed Jun 2026 · Next review Jun 2027

For school IT leads and Data Protection / Designated Safeguarding Leads

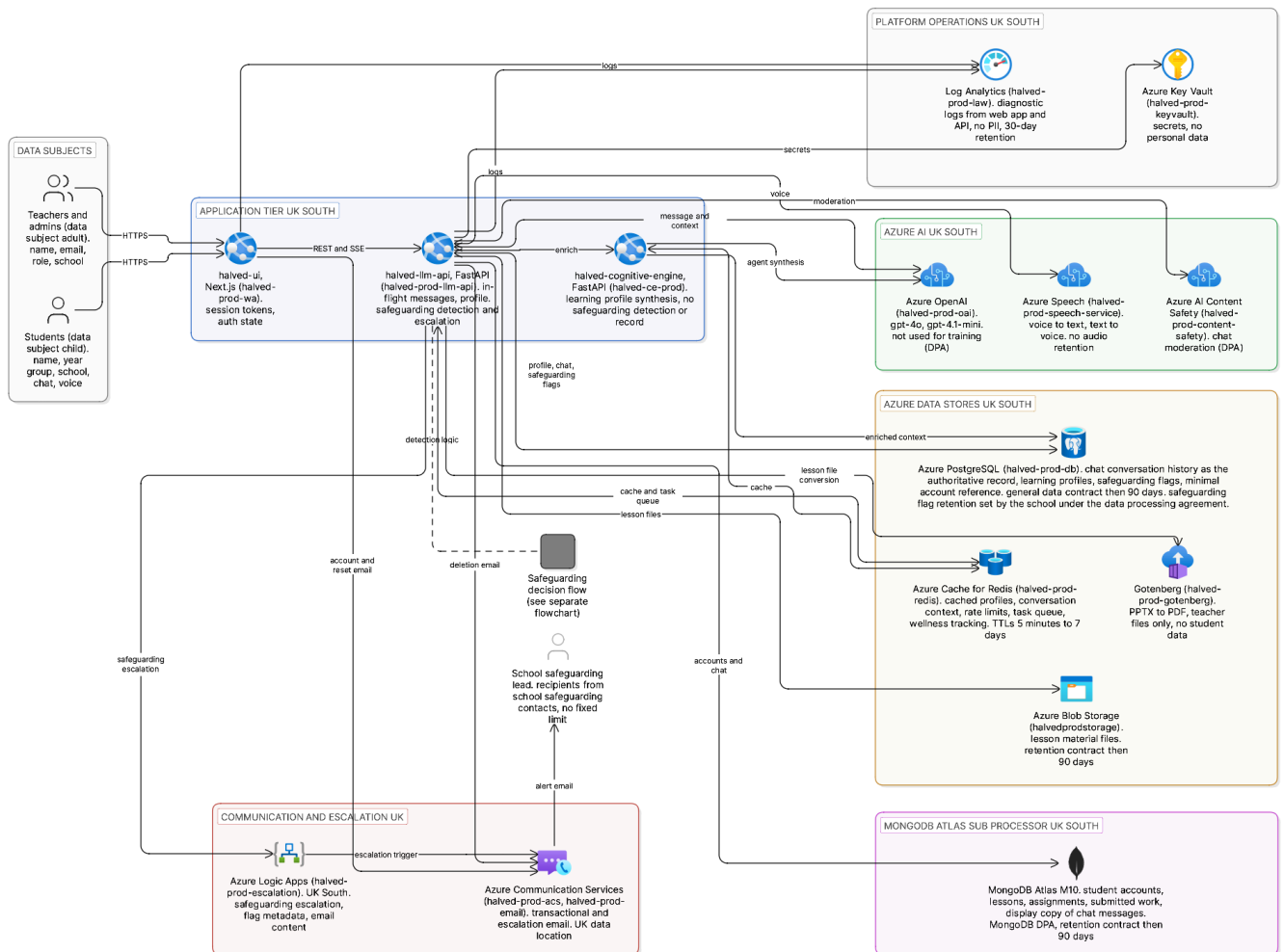
Version 3.0 | June 2026

Overview

Halved is an always available learning support system that brings expert guidance to every student at the exact moment they need it. This document describes what data Halved collects, where it is stored, how it is processed, and how it is protected. It is intended to support your school's data protection assessment and due diligence process.

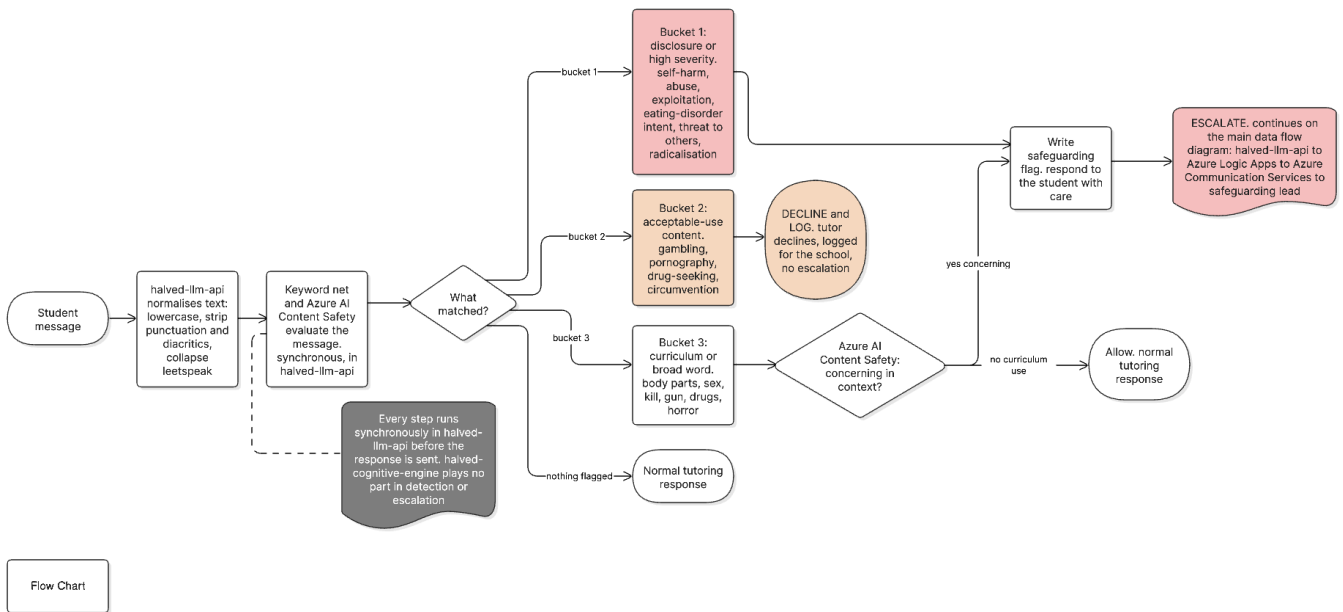
All data storage and all data processing, including artificial intelligence inference and voice processing, takes place within the United Kingdom. No student personal data is stored or processed outside the United Kingdom.

Data Flow Diagram



The Halved platform architecture and data flow, showing how data moves between the student's browser, the Halved application layer, and Microsoft Azure UK South services.

Safeguarding Decision Flowchart



How student messages are checked in real time: detection via Azure AI Content Safety, severity assessment, and escalation to the school's Designated Safeguarding Lead.

1. What data Halved holds about students

When a student account is created, Halved stores:

- Name and email address, used for login only.
- Year group and subject assignments, set by the teacher.
- Assignment work, the written work the student produces within Halved.
- Chat conversation history, the text of conversations between the student and Halved's learning support.
- A learning profile, a background summary built by Halved from how the student interacts during tutoring. It records observed learning behaviour only, such as topics covered, apparent strengths, areas of difficulty, preferred ways of learning, and recent engagement. It does not record any medical diagnosis, neurodevelopmental condition, or disability label. This summary is used to personalise future sessions and is held within Microsoft Azure UK South.

Halved does not collect:

- Biometric data.
- Location data.
- Device identifiers beyond a standard browser session.
- Payment information.

2. Where data is stored

All data is stored within the Microsoft Azure UK South region (London datacentres), or on MongoDB Atlas hosted in Azure UK South. No student personal data is stored outside the United Kingdom.

What	Storage technology	Location
Student accounts, lessons, assignments, submitted work, and the display copy of conversation messages shown in the interface	MongoDB Atlas	Azure UK South
Full chat conversation history as the authoritative turn-by-turn record, learning profiles derived from conversations, and safeguarding flags	Azure Database for PostgreSQL	Azure UK South
Uploaded lesson files (PPTX, PDF)	Azure Blob Storage	Azure UK South
Temporary cache, conversation context, rate limiting, and background task queue	Azure Cache for Redis	Azure UK South
Secrets and credentials	Azure Key Vault	Azure UK South
Application and audit logs	Azure Log Analytics Workspace	Azure UK South

All data is encrypted at rest. Secrets such as API keys, passwords, and encryption keys are stored in Azure Key Vault and never stored in plain text.

3. AI and voice processing

All AI inference and voice processing is performed within Microsoft Azure UK South. No student data is transmitted to servers outside the United Kingdom for AI or voice processing.

AI chat processing, Azure OpenAI (UK South)

When a student sends a message to Halved's learning support, that message, along with structured context about the lesson topic, assignment criteria, and the student's learning profile, is transmitted to the Microsoft Azure OpenAI Service, hosted in Azure UK South (London datacentres).

What is sent to Azure OpenAI:

- The student's message text, exactly as typed.
- Lesson notes and assignment criteria for the current task.
- A summary of the student's learning profile, expressed as observed learning behaviour (for example, that the student benefits from shorter explanations).
- A role-based identifier, a unique ID, not the student's name.

What is not sent to Azure OpenAI:

- The student's name or email address as structured fields.
- Diagnoses or condition labels. Halved is configured so that diagnosis and condition labels are never written into the learning profile or transmitted to the AI service.
- Submitted work from previous assignments.
- Any data not directly relevant to the current tutoring session.

Azure OpenAI Service is governed by the Microsoft Data Processing Addendum. Data sent via the Azure OpenAI API is not used by Microsoft to train foundation models, and Halved does not use student data to train third-party models.

Halved operates as a closed-loop tutoring system: it does not browse the internet and does not return public-search results.

Note: if a student types their name or personal details directly into the chat box, that text will be included in what is sent to Azure OpenAI, because Halved processes the message as written. Students should be advised not to include personal information in chat messages.

Voice features, Azure Speech Service (UK South)

Halved supports optional voice features, both processed entirely within Azure UK South:

- Speech to text, a student speaking their answer, processed via the Microsoft Azure Speech Service, UK South region.
- Text to speech, Halved reading content aloud, using the Microsoft Azure Speech Service (voice: en-GB-AdaMultilingualNeural), UK South region.

Voice features are optional. If your school prefers to disable them, this can be requested.

4. How access is controlled

Students and teachers log in with an email address and password.

- Passwords are stored using bcrypt hashing and are never stored or transmitted in plain text.
- Sessions use encrypted JSON Web Tokens with a seven-day expiry.
- Communication between Halved's web app and AI backend uses an internal API key, not exposed to the browser.
- Teacher accounts and student accounts are role-separated. Teachers can view only their own students' work.
- System administrator access is separately controlled and limited to Halved staff.

5. Safeguarding

Halved includes a live safeguarding pipeline operating across all environments. Student messages are checked in real time. Where a welfare concern is detected, the concern is logged and an alert is sent to the school's nominated safeguarding lead or leads. Lower-severity concerns are flagged and escalated without interrupting the student's session. Higher-severity concerns return appropriate support information to the student and are escalated immediately.

The safeguarding pipeline uses Azure AI Content Safety and Azure Logic Apps, both hosted in Azure UK South and covered by the Microsoft Data Processing Addendum. Safeguarding alert content, including a short excerpt of the flagged message, is sent to the school's nominated safeguarding contacts by email through Azure Communication Services (United Kingdom).

6. Data security summary

| Control | Status |

| Encryption at rest | Yes, all Azure storage | | Encryption in transit | Yes, HTTPS/TLS throughout | | Secrets management | Azure Key Vault | | Password storage | bcrypt hashed | | Role-based access control | Yes, student, teacher, admin | | UK data residency (all storage and processing) | Yes, Azure UK South and MongoDB Atlas Azure UK South |

7. Data retention and deletion

Halved retains student personal data for the duration of the school's contract. Following termination of services, general personal data is securely deleted within 90 days, unless Halved is required to retain it for longer to comply with legal, accounting, or regulatory requirements.

Safeguarding records are treated differently. Where a safeguarding concern has been recorded, the associated record is retained in line with statutory safeguarding guidance (Keeping Children Safe in Education) and the school's own retention schedule, which is typically up to seven years. This applies regardless of the general deletion timeline above.

Requests for deletion of an individual student's data during the contract period (the right to erasure under UK GDPR) should be directed to dataprivacy@halved.io. Halved will action these requests without undue delay and in any event within one month of receipt, extendable by up to two further months for complex or numerous requests. Where a record is subject to a statutory safeguarding obligation, Halved may retain it to the extent required by law. The school, as controller, determines the retention and erasure of safeguarding records, as set out in the Data Processing Agreement and aligned to the school's safeguarding retention schedule and Keeping Children Safe in Education.

In some circumstances, Halved may anonymise personal data so that it can no longer be associated with any individual. Anonymised data may be retained indefinitely and used to improve the platform.

8. Third-party services and sub-processors

All third-party services used by Halved process data within the United Kingdom and are covered by a Data Processing Agreement. A full sub-processor register is available on request.

Service	Purpose	Location	Student data involved	DPA
Microsoft Azure (App Service, PostgreSQL, Redis, Blob, Key Vault, Log Analytics)	Application hosting, primary data storage, secrets management	UK South	All student and teacher data	Microsoft DPA
Azure OpenAI Service	AI learning support responses	UK South	Chat messages, lesson context, learning profile summary	Microsoft DPA
Azure Speech Service	Speech to text and text to speech	UK South	Student voice audio, AI-generated text	Microsoft DPA
Azure AI Content Safety	Safeguarding and content moderation of messages	UK South	Chat message content	Microsoft DPA
Azure Logic Apps	Safeguarding escalation workflow to the school's Designated Safeguarding Lead	UK South	Safeguarding alert content and flagged message excerpts	Microsoft DPA
Azure Communication Services	Transactional emails (account creation, password reset) and safeguarding escalation emails to school leads	United Kingdom	User email addresses, names, account setup links, safeguarding alert content	Microsoft DPA
Azure Container Instances (Gotenberg)	Lesson material document conversion, PPTX and PDF converted to page images for display	UK South	Teacher-uploaded lesson material content	Microsoft DPA

Service	Purpose	Location	Student data involved	DPA
MongoDB Atlas	Student accounts, lessons, assignments, submitted work, and the display copy of conversation messages	Azure UK South	All structured student and teacher data	MongoDB DPA
Cloud202 (technical contractor)	Production infrastructure management, deployment, and Terraform state	London UK	Administrative access to production systems holding student and teacher data	Data Processing Agreement

9. Contact

For data protection questions related to your pilot, or to request a Data Processing Agreement, please contact:

Halved Limited

dataprivacy@halved.io

Registered in England and Wales, company number 15261677.

10. Review

This summary is reviewed at least once a year, and sooner when the platform architecture, data processing activities or sub-processors change. The next scheduled review is June 2027.

This document reflects the technical architecture of the Halved platform as at June 2026.

Questions about data protection? dataprivacy@halved.io

Website halved.io · students log in at my.halved.io

