

Data Retention Policy

v1.10 · Updated Aug 2026 · Reviewed Jun 2026 · Next review May 2027

Owner: Andrew James (CEO)

1. Purpose

This policy sets out the categories of personal data processed by Halved Limited (“Halved”) in respect of the Halved platform, and the retention periods that apply to each category or type of personal data, and the procedures by which data is deleted and/or anonymised at the end of each retention period. It supports Halved’s compliance with UK data protection legislation and helps demonstrate how we meet our legal and regulatory obligations.

2. Scope

This policy applies to all personal data collected, stored, or processed by Halved in respect of the Halved platform in connection with the delivery of AI-assisted learning support to UK schools. It covers data held in all storage systems operated on behalf of Halved, including by such of our sub-processors Azure PostgreSQL, MongoDB Atlas, Azure Blob Storage, and Azure Cache for Redis. For more details about the use by any of the aforementioned sub-processor, please see our Privacy Policy.

This Policy does not cover Halved’s retention of its own internal controller records such as human resources and benefits records, legal and accounting records, and sales and marketing records, which are maintained as internal confidential documents.

3. Data Controller and Processor

Where Halved provides the platform to a school, the school is controller for student personal data and school staff platform data processed in the school tenant, and Halved acts as processor under the school DPA. Halved acts as controller only for its own business administration, website enquiries, sales/contract records, support records, security/compliance records, complaints records and legal/accounting records.

4. Retention Schedule

The table below sets out the retention period for each category of personal data.

Data Category	Data Types	Storage Location	Retention Period	Basis for Retention
Student account data	Name, year group, school, hashed password, account creation date	MongoDB Atlas (Azure UK South)	Duration of school contract + 90 days (unless the school instructs earlier deletion or return)	School documented instructions as set out within the data processing agreement in accordance with UK GDPR Art. 28
Chat messages and session transcripts	Student messages, AI responses, session identifiers, timestamps	MongoDB Atlas (Azure UK South)	Duration of school contract + 90 days (unless the school instructs earlier deletion or return)	School documented instructions as set out within the data processing agreement in accordance with UK GDPR Art. 28; or safeguarding audit retention only where enabled and instructed by school
Student profile analysis	Learning style summary, subject observations, and a derived communication register value, derived from session data	Azure PostgreSQL (UK)	Duration of school contract + 90 days (unless the school instructs earlier deletion or return)	School documented instructions as set out within the data processing agreement in accordance with UK GDPR Art. 28

Data Category	Data Types	Storage Location	Retention Period	Basis for Retention
Lesson materials	Uploaded curriculum content linked to student sessions	Azure PostgreSQL + Azure Blob Storage (UK South)	Duration of school contract + 90 days (unless the school instructs earlier deletion or return)	School documented instructions as set out within the data processing agreement in accordance with UK GDPR Art. 28
Student-authored content	Student-uploaded files and documents; student free-text notes (work-completion and jotter)	Azure Blob Storage; MongoDB Atlas / Azure PostgreSQL (UK South)	Retained until the student deletes it using the in-product delete control, subject to a maximum of 24 months, and in any event deleted on contract end plus 90 days	School documented instructions (UK GDPR Art. 28); student-controlled deletion supports data minimisation and the rights of the child
Handwriting-input images	Canvas image of a student's handwriting, captured for the handwriting-to-text input method	Not stored; held in memory for the duration of the single conversion request only	Not retained	Recognise-and-discard; only the recognised text is stored, after screening

Data Category	Data Types	Storage Location	Retention Period	Basis for Retention
Recognised text from handwriting	Text Halved reads from a student's handwriting, once screened	Held with whatever surface the student was entering it into (for example a chat message or a piece of submitted work)	Same retention period as that surface	School documented instructions (UK GDPR Art. 28)
Submitted annotations	Marked-up lesson slide images: a student's drawings or marks, submitted as part of a piece of work	Azure Blob Storage; MongoDB Atlas (UK South)	Retained with the assignment record; no automatic expiry; in any event deleted on contract end plus 90 days; cannot be deleted by the student once submitted	School documented instructions (UK GDPR Art. 28); retained for marking and review
Teacher annotations	Marked-up slide images and mark coordinates authored by a teacher while marking student work	Azure Blob Storage / Azure PostgreSQL (UK South)	Duration of school contract + 90 days	School documented instructions (UK GDPR Art. 28); staff-authored feedback retained with the assignment record

Data Category	Data Types	Storage Location	Retention Period	Basis for Retention
Photographed work	Photograph of work a student has done on paper, uploaded by the student	Azure Blob Storage (UK South)	Retained as the image of that piece of work; in any event deleted on contract end plus 90 days	School documented instructions (UK GDPR Art. 28); the photograph is the record of that piece of work
Teacher-to-student messages	Message content, sender, recipients, timestamp	MongoDB Atlas (Azure UK South)	7 days from sending, then automatically deleted	Transactional teaching communication; data minimisation
Attainment records	Teacher marks, code-judged answer outcomes, time-in-productive-difficulty	Azure PostgreSQL (UK South)	Duration of school contract + 90 days (unless the school instructs earlier deletion or return)	School documented instructions as set out within the data processing agreement in accordance with UK GDPR Art. 28

Data Category	Data Types	Storage Location	Retention Period	Basis for Retention
Activity records	Interval records of when a student was active in the platform and on which surface: student identifier, school identifier, an optional session identifier, the surface (chat, work-completion, lesson-content, lesson-notes, homepage, or unknown), a start time and an end time each recorded to the minute, and the exact length of the period in seconds. No message content, no location and no device identifier. Where the session identifier is absent and the surface is unknown, the record attributes a period of time to a named student with no further context	Azure PostgreSQL (UK South)	Retained for a maximum of 12 months from the start time of the interval, purged by a scheduled job, and in any event deleted on contract end plus 90 days	School documented instructions as set out within the data processing agreement in accordance with UK GDPR Art. 28; the 12-month cap applies data minimisation to a record that is not otherwise anchored to the end of the contract

Data Category	Data Types	Storage Location	Retention Period	Basis for Retention
Safeguarding flags	Flagged message excerpts, category, severity, session reference, timestamp, status	Azure PostgreSQL (UK)	As instructed by the school and aligned with the school safeguarding retention policy (if applicable)	School documented instructions as set out within the data processing agreement in accordance with UK GDPR Art. 28; or (as applicable) For compliance with a legal obligation; safeguarding regulatory guidance (Keeping Children Safe in Education)
Authentication tokens	Session tokens, JWT identifiers stored in Redis	Azure Cache for Redis (UK South)	Session JWT expires after 7 days	Strictly necessary for security and session management
Application logs	App Service diagnostic logs (no PII in log body, see Logging Policy)	Azure Log Analytics workspaces (UK South)	30 days (unless a security incident requires longer retention of relevant extract)	Security and operational monitoring; data minimisation

Data Category	Data Types	Storage Location	Retention Period	Basis for Retention
Email delivery records	Delivery status, message ID, recipient address for transactional emails sent via Azure Communication Services	Azure Communication Services (United Kingdom)	30 days	Transactional delivery, support and security audit
Teacher and staff accounts	Name, email address, role, school, hashed password	MongoDB Atlas (Azure UK South)	Duration of school contract + 90 days (unless the school instructs earlier deletion or return)	School documented instructions as set out within the data processing agreement in accordance with UK GDPR Art. 28
School administrator accounts	Name, email address, administrator role, school identifier	MongoDB Atlas (Azure UK South)	Duration of school contract + 90 days (unless the school instructs earlier deletion or return)	School documented instructions as set out within the data processing agreement in accordance with UK GDPR Art. 28;

Data Category	Data Types	Storage Location	Retention Period	Basis for Retention
Security incident records	Incident ID, severity, affected systems/accounts, timeline, containment and remediation actions, notification assessment, resolution and lessons learned. Avoid student chat content, special category data, passwords, tokens or secrets except where strictly necessary.	Restricted security incident log / compliance storage	7 years from incident closure unless a shorter or longer period is required by law, regulator, insurer, school DPA or legal proceedings	Security incident management, UK GDPR accountability, regulatory evidence and legal claims
Administrative access records and access reviews	Admin Account Register, access grants/removals, role, system, start and end dates, monthly contractor access reviews, MFA/access control evidence and privileged-access audit information	Access management records / approved register	3 years from access removal, or up to 6 years where needed for audit, legal claims, regulatory investigation or Cyber Essentials evidence	Security, Cyber Essentials, audit and UK GDPR accountability

5. Post-Contract Deletion

Upon termination or expiry of the school's contract with Halved, all personal data subject to the "Duration of school contract + 90 days" retention period, together with all personal data that any other row of the retention schedule states is in any event deleted on contract end plus 90 days, will be permanently deleted within 90 calendar days of the contract end date. Where a category also carries a shorter cap of its own, such as the 12-month cap on activity

records or the 24-month cap on student-authored content, that cap applies during the contract and the contract-end deletion applies in addition to it. The 90-day window allows for:

Resolution of any outstanding data subject access requests or complaints;

Transition assistance to the school or its successor provider;

Final invoicing and contractual close-out.

Deletion will be performed by permanently removing the relevant records from MongoDB Atlas, Azure PostgreSQL, and Azure Blob Storage.

6. Safeguarding Data

Safeguarding flags are retained in accordance with the relevant UK school instructions provided to Halved as set out within the data processing agreement ('DPA') agreed between Halved and the school, or otherwise in accordance with the relevant UK school's documented lawful instructions. The specific retention periods for safeguarding flags are as set out within the relevant DPA or are otherwise aligned to the relevant school's safeguarding retention policy and/or documented instructions. In the event of any conflict between the retention periods set out within the DPA between Halved and the relevant school, the DPA shall prevail, unless and to the extent that Halved and the school agree otherwise.

Access to safeguarding records after contract termination will be restricted to the designated safeguarding leads of the contracting school and to Halved's designated safeguarding officer.

7. Deletion Verification

Halved will maintain a deletion log recording the date, scope, and method of each deletion event. The deletion log itself does not contain personal data and records only the school identifier, the data categories deleted, and the timestamp. The log will be retained for 3 years.

Where a school or data subject requests confirmation of deletion, Halved will provide written confirmation within 30 days following the date of deletion.

8. Sub-processor Retention and Deletion

All sub-processors used by Halved are bound by the Microsoft Customer Agreement and Microsoft Data Protection Addendum, which include obligations to delete personal data in accordance with the controller's documented instructions. MongoDB Atlas is bound by MongoDB's Data Processing Agreement.

Halved will issue written deletion instructions to relevant sub-processors within 30 days of a contract end date. Sub-processors are required to confirm deletion within their own documented SLAs.

9. Backup Retention

Automated backups are retained as follows:

MongoDB Atlas: Point-in-time restore enabled with a 7-day restore window. Backups are stored within Azure UK South.

Azure PostgreSQL: Automated backups are retained for 7 days with geo-redundant storage within the UK.

Azure Blob Storage: No automatic backup; data durability provided by Azure LRS (locally redundant storage) within UK South.

No backup snapshot will be retained beyond the applicable retention period for the data category it contains.

10. Data Subject Rights and Early Deletion

For further information about the rights of data subjects, please see our Privacy Policy.

In respect of any requests received by Halved from a data subject to exercise their right to erasure (including when such request is received from a student, a parent and/or legal guardian) Halved will comply with all such requests and delete the specific personal data without undue delay and in any event within one month of receipt of the request. This period may be extended by up to two further months where the request is complex or numerous, in which case Halved will inform the data subject within one month of receipt and explain the reasons.

A student may delete their own uploaded content and free-text notes at any time using the in-product delete control, and deletion is actioned immediately. Students can also delete their own working annotation drawings on a lesson at any time before those annotations are submitted. Once annotation content is submitted to the teacher as part of a piece of work, it forms part of the assignment record and is retained for marking and review; it cannot be

deleted by the student. Teacher feedback annotations are authored by staff and retained with the assignment record. Annotation content flagged by safeguarding screening is retained for staff review.

Requests for the erasure of any special category personal data retained by Halved or any of its sub-processors will be complied with without delay (and in any event, within one month of receipt of any request).

There may be circumstances where Halved has a legal obligation to retain information (excluding special category information) which will result in Halved having to refuse to comply with an erasure request. In such circumstances, Halved will inform the data subject without delay and shall set out the reasons for such refusal. The circumstances that may be relied upon for such refusal include (but are not limited to) compliance with applicable laws and/or regulations, or for establishing, exercising or defending legal claims.

11. Policy Review

This policy is reviewed annually (or upon a material change to the Halved platform's data processing activities, applicable law, or regulatory guidance). The next scheduled annual review is May 2027.

12. Document Control

Field	Detail
Owner	Halved Limited
Classification	Confidential, for data protection lead review

Questions about data protection? dataprivacy@halved.io

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

Halved Limited · registered in England and Wales, company number 15261677