

Privacy Policy

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Owner: Andrew James (CEO)

Halved Limited (“**Halved**”) is the operator of the Halved platform and website. Where Halved processes personal data as controller, it is the organisation legally responsible for deciding how and why that personal data is used. Where Halved processes student and school staff platform data for a school, the school is controller and Halved is processor, as explained below.

We are **Halved Limited** (hereafter referred to as “**Halved**”, “**we**”, “**us**”, “**our**”) and we are committed to protecting personal data. This privacy notice explains how personal data is collected, used, shared, stored and protected when schools, teachers, school administrators, students and website visitors use the Halved platform at <https://www.halved.io>, contact us, or use our website.

This notice applies to school administrators, teachers, students and website visitors. It should be read alongside the relevant school privacy notice. For students, parents and legal guardians, the school remains the first point of contact for questions about how student data is used in the school setting.

What this notice covers

This notice applies to personal data processed through the Halved platform and website. It does not replace the school’s privacy notice. It also does not apply to third-party websites or services linked from Halved; those organisations are responsible for their own privacy information.

This version is mainly written for adults, including school staff, parents and legal guardians. Halved will also make student-facing privacy information available before or when students first use the platform, in a concise, age-appropriate form for students using the platform.

Who are we?

Controller and processor status. For personal data processed through a school tenant for the purpose of delivering AI-assisted learning support to that school, the school is the controller and Halved acts as processor under a written data processing agreement. This includes student account data, teacher-created assignments, student assignment work, chat history and AI learning profiles. Halved processes that data only on the school documented instructions, except where UK law requires otherwise. Halved is controller for personal data it processes for its own business purposes, including website enquiries, news updates, supplier and customer administration, sales records, security administration and compliance records.

If you have any questions about this privacy notice or our privacy practices, please contact us:

Legal entity: **Halved Limited**

Email: dataprivacy@halved.io

Registered office address: 4 Comet House, Calleva Park, Aldermaston, Berkshire, RG7 8JA.

If you are a student, parent or legal guardian and your question concerns student data held in the school platform, please contact the school first. Halved will assist the school in responding to validated requests.

How do we use your data?

Personal data we collect and how it is collected

The personal data processed by Halved depends on how you interact with the platform and website. It may include names (for school staff; for students, a unique identifier and, by default, a first name used within chat, with full names held by the school), school email addresses, school, year group, a school-supplied reading age and school-supplied indications of whether a student is working at age expectation in English and in maths, role, account details, hashed passwords, teacher-created assignment allocations, assignment work and submitted content, student-uploaded content, student-authored free-text notes, chat messages and AI responses, AI-generated learning profile summaries, student-provided answers to fixed-choice questions about how a student prefers to learn and how they approach their work, activity records showing when a student was working in the

platform and on which surface, optional voice audio where voice features are enabled, safeguarding alert content and metadata, support and enquiry details, news-update preferences, technical and security logs, and cookie or usage information.

Personal data is collected directly from schools and teachers when they configure tenants, classes, assignments and accounts; directly from students when they use the platform; directly from you when you contact Halved or sign up to updates; and automatically from the website or platform through necessary logs, session technologies and cookies.

Where personal data is needed to provide the platform, administer an account, respond to an enquiry, keep the service secure or comply with law, failure to provide it may mean that the relevant service or functionality cannot be provided. Where personal data is optional, Halved will make this clear and explain any effect of declining to provide it.

School and teacher accounts. For platform access, we process names, school email addresses, role, school identifier, hashed password and account administration information. Where this relates to the school use of the platform, Halved acts as processor for the school. Where Halved uses school contact details for contract administration, service notices, support, billing, security management or legal compliance, Halved acts as controller and relies on contract necessity, legitimate interests and/or legal obligation, as applicable.

Student accounts. Student accounts are created or authorised by the school. Each student is identified on the Halved side by a unique student identifier, which is the primary record. We hold a school email address for authentication and account communications, and by default the student's first name for use within chat. A student's full name is held by the school, not by Halved. Schools may instead choose a no-names configuration, in which even the first name is held by the school and Halved holds only the identifier and email. We also process year group, school and subject or assignment allocations. The school additionally supplies, as fixed choices, a reading age for the student and whether the student is working at age expectation in English and in maths. These are attainment and reading measures the school already holds, recorded as the school states them and neither assessed nor inferred by Halved. They are not SEND status, not a diagnosis, not a condition and not a disability label, and there is no free-text field anywhere in this set. The platform does not capture SEND, accessibility, health or disability flags. The AI learning profile is built from observed learning behaviour, together with this school-supplied information and the fixed-choice answers a student gives about how they prefer to learn, and it does not record any diagnosis, neurodevelopmental condition or disability label. The school is responsible for identifying the

relevant Article 6 lawful basis; Halved processes student data only on the school documented instructions and applies appropriate confidentiality, access control, minimisation and security safeguards.

Platform usage and AI learning support. When students and teachers use the platform, Halved processes assignment work, chat conversation history, AI responses, lesson context, role-based identifiers, session timestamps and AI-generated learning profile summaries. The AI learning profile is built from the student's use of the platform and from the student-provided and school-supplied inputs described in this notice, and is used to personalise future learning support sessions, such as by giving shorter explanations or identifying topics that may need reinforcement. Halved also derives a communication register, a coarse language-pitch value that adjusts the vocabulary and sentence complexity used with the student. This is profiling used only to pitch communication. The register is derived from the student's year group, from the reading age the school supplies, and from how the student responds during use, which adjusts it over time. It is a setting for how Halved talks to a student and not a judgement of the student: it is not itself a record of ability or attainment, it records no special-category data, and it is not used to make decisions producing legal effects concerning a student or similarly significant effects. Halved's own record of attainment is separate and is described below.

Two of the inputs Halved uses come from the student directly, rather than from observing how they work. A student can optionally tell Halved how confident they feel about the task they are working on, on a simple scale. A student is also asked fixed-choice questions about how they prefer to learn and how they approach their work. Both are answered by choosing from options Halved provides, and neither carries free text. The confidence scale records confidence with a task or skill only, never mood, feelings or wellbeing. The learning-preference questions record a preference or a working approach only, and do not ask about health, disability, SEND status, a diagnosis or any other special category of data. Answering is optional in both cases. Both are used to personalise the support the student receives. The confidence scale may be shown to the student's teachers as a trend over time. The answers to the learning-preference questions are not shown to teachers and are not read by any other part of the platform; if that changes, this notice will be changed first, because a teacher seeing what a child has said about themselves is a material difference rather than a matter of implementation. Halved does not use identifiable student personal data to train third-party foundation models or for independent product development. Any service-improvement analysis using student-derived data must be carried out only on an anonymised or aggregated basis, unless the school has given documented instructions for the specific processing.

Attainment and progress. Halved records how a student is performing on their work, so that teachers can see progress and so that Halved can pitch its support appropriately.

Three things are recorded. First, the marks a teacher gives a student's work. Second, whether a student's answer to a question was correct, where that can be determined by a straightforward check rather than by an opinion. Third, how long a student spends working productively on a task that is stretching them.

These are records of what happened on a piece of work. They are shown to the student's teachers, and to the student, as a picture of progress over time. Halved does not rank students against one another, does not produce league tables, and does not publish comparisons between students.

Attainment is a record of performance on work. It is not a measure of a student's ability, and it is not a diagnosis. Halved also holds the reading age and the working-at-age-expectation indications the school supplies, which are the school's own measures, recorded as the school states them and neither assessed nor inferred by Halved. Halved does not record or infer SEND status, developmental stage, cognitive ability, or any special-category data, and neither an attainment record nor a school-supplied measure is used to do so.

Activity and time spent. Halved holds a record of when a student was working in the platform and on which part of it. This is recorded separately from attainment and is a different kind of record: attainment is about how a student did on a piece of work, while this is about when they were working and for how long.

Each activity record covers one continuous period of activity. It holds a start time and an end time, each held to the minute, which part of the platform the student was on (chat, work completion, lesson content, the lesson list, the homepage, or unknown where that could not be determined), and, where it is known, the session the activity belonged to. It also holds how long the period lasted, stored in seconds. The length is worked out before the start and end times are reduced to the minute, so it stays exact and loses nothing in the rounding: a period of seven minutes and thirty-two seconds is held as exactly that length. What Halved does not hold is the second within the minute at which a student started or stopped working. Some records hold no session and a surface of "unknown", so they record that a named student was active for a period of time without recording anything about what they were doing. The record holds no message content, no work content, no location and no device identifier.

Because these are clock times, they cover whenever a student chooses to work, including evenings, weekends and school holidays.

Halved uses these records for three things: the total time a student has spent working, how much of that time was spent with Halved's support as a proportion of the total, and a picture of when in the day a student works. These are shown to the student's teachers. A student also sees their own activity record, including a version of the when-in-the-day view, so that a student can see what is held about their own working time.

Recording, the teacher measures and the student's own view of their record are all built. Halved committed that the timer creating activity records would be released together with the student's own view of them, and not before it. That commitment was met: they were released as a single change, so there is no version of Halved in which a student's working time is recorded while the student has no way to see it. Recording of a student's activity begins in a given environment of the platform when that release is deployed there, and where it has not been deployed no activity record exists.

Two limits are built into how the record is made. Only students are recorded: the timer does not run for staff accounts. And an interval ends at the last moment a student was seen working, not at the later moment the platform noticed they had stopped, so a student who stops and walks away is recorded as having stopped when they stopped. This means the record can understate how long a student spent working, and cannot overstate it.

Activity records are retained for a maximum of 12 months, and in any event are deleted on contract end plus 90 days, as set out in the Data Retention Policy.

Handwriting, drawing and photographed work. Some students find it easier to write or draw than to type. Halved offers three ways to do this, and they are handled differently.

Where a student writes by hand as a way of entering text, the handwriting is converted into text so that Halved can read it. The image of the handwriting is used only for that conversion, is held in memory for the length of that single request, and is never stored by Halved or by the service that performs the conversion. Only the resulting text is kept, and it is screened by Halved's safety checks before it is stored or shown to anyone.

Where a student draws or marks on a lesson slide as part of their work and sends it to their teacher, the marked-up slide is saved as part of that piece of work, in the same way as any other work a student submits. It is screened by Halved's safety checks and retained with the assignment record.

Where a student photographs work they have done on paper and uploads it, the photograph is stored by Halved as part of that piece of work, is screened, and any text in it is read so that Halved can support the student with it. The photograph remains as the image

of that piece of work.

Teachers' marks and feedback on a student's work are authored by school staff and are retained with the assignment record.

Student control. A student can delete their own working drawings on a lesson at any time before they send the work to their teacher. Once work has been sent to a teacher it forms part of the assignment record: it is retained for marking and review and cannot be deleted by the student. This is deliberate, so that work cannot be withdrawn after a teacher has been asked to look at it, and so that anything a student has disclosed to a member of staff cannot be removed by the student afterwards. Content flagged by Halved's safety screening is retained for staff review.

Messages from teachers. Teachers can send messages to their students through Halved, for example to remind a class about a deadline or to pass on a note about a piece of work. Halved processes the content of the message, who sent it, who it was sent to, and when. Messages are visible to the student they are sent to and to the staff who sent them. Messages are held for 7 days and are then deleted automatically.

Messages are written by school staff, not generated by Halved's AI, and Halved does not use them to build a student's learning profile.

News updates. If you sign up to receive our news updates, we collect your name and email address to send them to you. We rely on consent or another lawful basis permitted by the Privacy and Electronic Communications Regulations (PECR) and UK GDPR. You can unsubscribe at any time by using the unsubscribe link in our emails or by emailing dataprivacy@halved.io.

Contact enquiries and support. When you contact us by email, through our website or through a support channel, we collect your name, contact details and the content of your enquiry so that we can respond, administer our services and keep appropriate records. We rely on legitimate interests, contract necessity and/or legal obligation depending on the nature of the enquiry.

Website cookies

For more information about our deployment of and use of cookie information, please see Cookie Policy.

Controller purposes and lawful bases - more detail

The following table gives further detail about Halved controller processing. Student and school staff platform data processed for a school remains subject to the school DPA and the school documented instructions.

What Halved uses personal data for	Relevant personal data	Role and lawful basis
Providing and administering school-facing platform access for school staff	Staff names, school email addresses, role, school identifier, account and support information	Processor for school platform data. As controller for customer administration: contract necessity, legitimate interests and legal obligation, as applicable.
Responding to enquiries and support requests	Contact details, role, school or organisation, enquiry content and support records	Legitimate interests, contract necessity and/or legal obligation, depending on the nature of the request.
News updates and adult marketing communications	Name, email address, organisation, role and communication preferences	Consent or legitimate interests where permitted by UK GDPR and PECR. Students must not receive marketing through the platform.
Non-essential cookies, website analytics and similar technologies	Cookie identifiers, browser/device information and website usage information	Consent where required by PECR and UK GDPR. Strictly necessary cookies are used to provide the service.
Security, audit logging, fraud prevention and incident response	Account identifiers, session information, audit logs, security events and technical metadata	Legal obligation and legitimate interests in keeping the platform secure and protecting users, schools and Halved.
Legal claims, regulatory compliance, accounting, audit and corporate administration	Relevant account, contact, transaction, correspondence and compliance records	Legal obligation and legitimate interests in protecting, managing and evidencing Halved's business and legal rights.
Student-facing platform data processed for a school	Student account data, assignments, chat history and AI learning profiles	Halved acts as processor under the school's documented instructions. The school identifies the Article 6 lawful basis.

When Halved relies on legitimate interests as controller, it will assess whether its interests are overridden by the rights and interests of the relevant individual. You may request information about that assessment by contacting Halved.

Special category data

The platform is not designed to capture special category data and does not collect SEND, accessibility, health or disability flags. The AI-generated learning profile is built from observed learning behaviour, from the fixed-choice answers a student gives, and from the year group, reading age and working-at-age-expectation information the school supplies, and it does not record any diagnosis, neurodevelopmental condition or disability label. Halved does not solicit special category data. Where Halved asks a question at all, of a student or of a school, the question is fixed-choice and the available answers are set by Halved: students are asked how they prefer to learn and how they approach their work, and schools are asked for year group, reading age and whether the student is working at age expectation in English and in maths. None of these questions asks about health, disability, SEND status, a diagnosis or any other special category of data, and none of them offers a free-text answer. Where a student includes sensitive information in a chat message or in uploaded content, that content is screened through the content-safety pipeline; where a student includes it in a free-text note, that content is not screened but is visible to authorised staff. In either case the school, as controller, is responsible for identifying any applicable Article 9 condition and Data Protection Act 2018 Schedule 1 condition, and Halved processes such content only on the school's documented instructions.

No sale or advertising use

Halved will not sell student personal data, use student personal data for behavioural advertising, or use student personal data to train third-party foundation models.

Approved applications and AI tools

Halved's internal approved applications list does not authorise staff or contractors to process student personal data, school-controlled personal data or confidential school materials in general-purpose AI tools, social media tools, Dropbox or other non-platform applications. Those tools must not be used with student data unless separately assessed, approved, covered by appropriate contractual terms and, where required, added to the school DPA and sub-processor register.

Marketing and news updates

Halved will not send marketing or news updates to students through the platform. Adult school contacts and website visitors may receive news updates or service information where permitted by UK GDPR and PECR.

You can opt out of marketing communications at any time by using the unsubscribe link in Halved emails or by contacting dataprivacy@halved.io. This will not affect non-marketing service messages, security notices or communications that Halved is required or permitted to send for contractual, operational or legal reasons.

Halved will not sell personal data or share personal data with third parties for their own marketing purposes.

Processing children's data

The Halved platform is used by students, including children under the age of 18. Student accounts are created and managed by schools and teachers, not directly by students or parents. Halved processes student personal data only for school educational purposes and on the school's documented instructions. The following section gives further detail about use of generative AI in an education setting, including child-appropriate safeguards.

Personal data processed in an education setting

This section explains how personal data is processed where Halved is deployed by a school to provide AI-assisted learning support. It is intended to supplement, not replace, the school's own privacy notice. The school remains the controller for student and school staff platform data and determines the educational purposes and lawful basis for the processing. Halved acts as processor for that school-controlled data under a written data processing agreement, except where Halved separately acts as controller for its own administration, security, legal compliance or business records.

Data subjects who may be affected

The processing may involve students who use the platform, including children aged under 18 and students with SEND or accessibility needs; teachers, tutors, school administrators and designated safeguarding leads who configure or supervise use of the platform; parents or

legal guardians where their details or correspondence are provided by the school or included in a support or safeguarding context; and Halved personnel or authorised technical support users whose access is recorded in audit and security logs.

Types of personal data processed

Depending on the school configuration and features enabled, Halved may process identity and account data, such as a unique student identifier, staff names, a student first name where used in chat, school email address, role, school, year group, class and account credentials; educational data, such as teacher-created assignments, lesson context, assignment criteria, submitted work, quiz or task responses, teacher feedback, student-uploaded content and student-authored free-text notes; chat content, including student prompts, AI responses and conversation history; school-supplied information about a student's starting point, being a reading age and whether the student is working at age expectation in English and in maths, each supplied as a fixed choice; student-provided answers to fixed-choice questions about how a student prefers to learn and how they approach their work, and an optional task-confidence self-assessment; inferred learning data, including AI-generated learning profile summaries about apparent strengths and areas of difficulty, and about preferred learning approaches where those are inferred rather than stated by the student; optional voice audio and AI-generated audio where speech features are enabled; safeguarding alert content, message excerpts and escalation metadata; activity records of when a student was working in the platform and on which surface, held as interval start and end times; and technical data such as session times, role-based identifiers, security events, audit logs and diagnostic metadata.

How the generative AI works

Halved is a closed-loop educational support tool. It does not browse the internet, does not return public search results and does not use identifiable student personal data to train third-party foundation models. When a student sends a message to the AI, Halved sends the message text, relevant lesson notes, assignment criteria, the immediate conversation context, a role-based student identifier and a limited summary of the student's learning profile to Azure OpenAI Service in the UK South region. Halved does not send the student's name or email address as structured fields to Azure OpenAI. However, if a student types personal information into a chat message, that information will form part of the message text processed by the AI service.

Explanation of the AI output

The AI generates natural-language responses by predicting helpful text from the instructions, lesson materials and conversation context supplied to it. The output is not a human decision, is not guaranteed to be error-free, and should not be treated as an official educational assessment, disciplinary decision or safeguarding determination. The AI-generated learning profile is an inferred summary used to adapt future learning support, for example by providing shorter explanations, checking understanding, or revisiting topics that appear difficult. It is not intended to diagnose, label or determine a student's SEND, disability or health status, and it is not used to make decisions with legal or similarly significant effects about students. Teachers and schools remain responsible for supervising the learning activity, reviewing outputs where appropriate and making educational, pastoral and safeguarding decisions.

Third-party sub-processors used to provide the platform and generative AI

Halved uses the sub-processors listed in the section "Who do we share personal data with?". For generative AI and related platform delivery, these include Microsoft Azure for hosting, storage, security, logging and infrastructure; MongoDB Atlas for structured platform data; Azure OpenAI Service for AI learning support responses; Azure Speech Service where optional speech-to-text or text-to-speech is enabled; Azure Communication Services for transactional and safeguarding escalation emails; Azure Container Instances/Gotenberg for document conversion of teacher-uploaded lesson materials; Azure AI Content Safety and Azure Logic Apps for the safeguarding pipeline; Cloud202 Ltd for authorised technical development, support and maintenance. Cloudflare provides DNS, CDN and security for the Halved website (halved.io) only and does not process student or school personal data through the platform. Planned or conditional providers must not process live student data until assessed, contractually covered and activated in accordance with the school DPA and sub-processor notification arrangements.

Lawful basis

Where Halved processes student and school staff platform data for a school, Halved acts as processor and relies on the school's documented instructions rather than identifying its own Article 6 lawful basis for that school-controlled processing. The school is responsible for identifying and communicating its lawful basis. In many UK state school deployments, the relevant lawful basis is likely to be public task under Article 6(1)(e) UK GDPR, although

schools must make their own assessment. Independent schools or other education providers may in some cases rely on legitimate interests, contract necessity, legal obligation or another lawful basis depending on the circumstances.

The platform does not capture SEND, accessibility, health or disability flags, and the fixed-choice questions Halved puts to students and to schools do not ask about any of them. Where safeguarding information or other sensitive information is processed, for example where a student includes such information in a chat message, in uploaded content, or in an unscreened free-text note visible to staff, the school is responsible for identifying an Article 9 condition and any required Data Protection Act 2018 Schedule 1 condition, such as substantial public interest conditions relevant to safeguarding.

Where Halved acts as controller for its own business, security, support, legal or compliance purposes, the lawful bases are set out in the controller purposes and lawful bases section above.

Children's Code (Age-Appropriate Design Code) safeguards

Halved will apply the following child-privacy safeguards where the platform is used by children, including where those safeguards are adopted as good practice to support the school's own compliance with the ICO Children's Code (Age-Appropriate Design Code). In particular, Halved will place students' best interests at the centre of design and operation; support the school with DPIA information and data flow documentation; provide concise, prominent and age-appropriate privacy information, including point-of-use explanations for AI personalisation/profiling and prompts to ask a teacher or trusted adult if a student is unsure; use high-privacy defaults; collect and use only the personal data needed for the educational purpose; avoid using student data for advertising, sale of data, behavioural profiling, unrelated analytics or independent model training; restrict profiling to explainable learning-support personalisation; avoid nudge techniques that encourage students to weaken privacy settings or share unnecessary personal data; not collect geolocation, biometric data, payment data or device identifiers beyond what is needed for a standard browser session; limit sharing to approved sub-processors; apply role-based access controls, encryption, audit logging and retention limits; and provide routes for students, parents and schools to raise concerns or exercise data protection rights through the school.

School configuration and supervision

Schools should decide which classes, subjects, students and features are appropriate for the deployment, including whether optional voice features are enabled. The safeguarding pipeline is a standard, always-active part of the platform, and each school must provide at least one designated safeguarding lead and a monitored email address to receive safeguarding alerts. Schools should tell students not to include unnecessary personal information in chat messages and should ensure teachers understand that AI outputs are support materials requiring professional oversight, not a substitute for teacher judgement or safeguarding procedures.

Who do we share personal data with?

We share personal data with the following categories of third parties:

- **Technology providers and sub-processors:** We use the technology providers listed below to operate, host, support and secure the platform. Where student data is processed for a school, these providers act as sub-processors and must be covered by written data processing terms. Planned or conditional providers must not process live student data until they are activated under the school DPA (and the school has been notified where required).

Provider	Purpose	Location	Data involved
Microsoft Azure	Primary hosting, storage, security services, audit logging and infrastructure services	UK South / United Kingdom regions, as configured	Platform data required to host, secure and operate the service
MongoDB Atlas	Student accounts, lessons, assignments and structured platform data	Azure UK South	Structured platform data as configured for the school tenant

Provider	Purpose	Location	Data involved
Azure OpenAI Service	AI learning support responses and language model inference	UK South	Chat messages, lesson context, role-based identifier and learning profile summary. Student names and email addresses are not sent as structured fields.
Azure Speech Service	Optional speech-to-text and text-to-speech voice features	UK South	Student voice audio and AI-generated text where the school enables voice features
Azure Communication Services	Transactional emails and safeguarding escalation emails	United Kingdom	Username, email addresses, account setup/password reset links and safeguarding alert content
Azure Container Instances (Gotenberg)	Document conversion for teacher-uploaded lesson materials	UK South	Teacher-uploaded lesson material content
Azure AI Content Safety	Automated content safety moderation	UK South	Chat message text and safety metadata
Azure Logic Apps	Safeguarding workflow orchestration if enabled	UK South	Safeguarding flag metadata and escalation email content
Cloud202 Ltd ('Cloud202')	Technical platform development, support and infrastructure maintenance where access to personal data is required	United Kingdom	Potential access to platform data for support and maintenance under Halved instructions and Article 28/sub-processor terms. No independent use, download, reuse or retention of student data; access must be named, MFA-protected, least privilege and reviewed.

Provider	Purpose	Location	Data involved
Cloudflare (website only)	DNS, CDN and security for the Halved marketing website (halved.io)	Active for the website; not in front of the platform	IP addresses, headers and security metadata of website visitors. Does not process student or school personal data.

Cloud202 access to personal data is permitted only under appropriate Article 28/sub-processor terms, documented access controls, MFA, least privilege and removal of temporary contractor access when no longer required.

Cloudflare fronts the Halved marketing website (halved.io) only and does not sit in front of the student-facing platform (my.halved.io). It therefore processes no student or school personal data and is not a platform sub-processor. This was confirmed in June 2026 by inspecting response headers, which showed Cloudflare serving halved.io but not my.halved.io.

Regulators and authorities. We may share personal data where required by law or where necessary for safeguarding, security, prevention or detection of crime, legal claims, or to protect rights, property or safety. Where Halved is processor, such disclosures will be made in accordance with the DPA, documented instructions or applicable law, and we will inform the school unless legally prohibited.

Halved only allows service providers and sub-processors to handle personal data where Halved is satisfied that they take appropriate measures to protect it and where appropriate contractual obligations are in place. Where Halved acts as processor, sub-processors must be authorised under the school DPA or notified to the school in accordance with that DPA.

Halved may also share relevant personal data with professional advisers, insurers, auditors, banks, law enforcement agencies, courts, public authorities and regulators where necessary for legal, regulatory, accounting, audit, insurance, safeguarding, security or dispute-resolution purposes.

If Halved undergoes a merger, acquisition, asset sale, investment, restructuring or insolvency process, relevant personal data may be shared with the other parties and professional advisers involved. Halved will limit the information shared where possible and will require appropriate confidentiality protections.

Where do we store your data?

Data residency and international transfers. Production data is hosted in UK regions as described in the Data Flow and Data Handling Summary. Halved will not intentionally host student personal data outside the UK. If any restricted transfer arises, including support access from outside the UK, Halved will ensure appropriate safeguards under Chapter V UK GDPR are in place and will notify the school where required by the DPA.

International transfers - more detail

The current position is that production student personal data is hosted in UK regions. If Halved needs to transfer personal data outside the UK in the future, including support access from outside the UK, Halved will do so only where an adequacy regulation, the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, or another lawful transfer mechanism applies.

Halved will not permit access to UK school or student personal data by any non-UK affiliate or operation unless the school has been notified where required and appropriate UK GDPR transfer safeguards and processor or sub-processor arrangements are in place.

How long do we keep your data?

Retention. Student and school staff platform data is retained in accordance with the school contract, the school documented instructions and the Halved Data Retention Policy. Unless a longer period is required by law or the school documented instructions, school-controlled personal data will be deleted or returned within 90 days after termination of the school contract. Safeguarding records must be retained only for the period agreed with the school and aligned with the school safeguarding retention schedule.

Anonymisation. Halved may retain information indefinitely only where it has been anonymised so that individuals are no longer identifiable, taking account of the risk of singling out, linkability, and inference. Pseudonymised data remains personal data and is not treated as anonymised. Halved must not attempt to reidentify anonymised information.

AI profiling and automated decision-making. Halved creates an AI-generated learning profile from a student's interactions with the platform to personalise learning support. This is profiling/inferred data for data protection purposes, as explained in the section "Personal data processed in an education setting". The communication register, a coarse language-pitch value derived from the student's interaction, is included in this profiling. Activity

records are a factual record of when a student was working, not an inference about them, but Halved treats the reporting of a student's working time and time-of-day pattern as profiling for data protection purposes and applies the same limits to it. Neither the learning profile, the communication register nor an activity record is used to make decisions with legal or similarly significant effects about a student, and none of them replaces teacher judgement. Teachers and schools remain responsible for educational decisions.

Keeping personal data secure

Halved uses appropriate technical and organisational measures designed to prevent personal data from being accidentally lost, used, accessed, altered or disclosed unlawfully. These include encryption in transit, encryption at rest, role-based access controls, secrets management, audit logging and controlled administrator access, as described in Halved's Security Policy.

Access to personal data is limited to people and providers with a genuine need to access it for the purposes described in this notice and, where relevant, under the school DPA. Halved also maintains procedures to deal with suspected personal data breaches.

Administrative and contractor access to production systems is restricted to authorised personnel with a need to know and must use named accounts, MFA, least privilege, password-manager storage, access logging/review and timely removal of temporary contractor access.

Where Halved acts as processor for a school, Halved will notify the school without undue delay after becoming aware of a personal data breach affecting school-controlled personal data. Where Halved acts as controller, Halved will notify affected individuals and/or the ICO where legally required.

What are your rights under data protection law?

Where Halved acts as controller, you may have the rights listed below. Where Halved acts as processor for a school, requests about student or school staff platform data should be made to the school, and Halved will assist the school in responding.

- **Request access to your personal data (subject access request):** to receive a copy of the data we hold and to check we are processing it lawfully.
- **Request correction:** to have incomplete or inaccurate data corrected.

- **Request erasure:** to ask us to delete your personal data where there is no good reason to continue processing it. Note that we may not always be able to comply for specific legal reasons, which we will explain if applicable.
- **Object to processing:** where we rely on legitimate interest, or where we process your data for direct marketing.
- **Request restriction of processing:** to ask us to suspend processing in certain circumstances.
- **Request data portability:** to receive your data in a structured, machine-readable format where applicable.
- **Withdraw consent:** where we rely on consent. This will not affect the lawfulness of any processing before withdrawal.

You also have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal or similarly significant effects, where applicable. Halved does not use the platform to make such decisions about students.

You also have the right to lodge a complaint. For more information, please see the section 'How to complain' below.

Please be aware that these rights are not absolute and will not be available in all circumstances.

To exercise a right where Halved is controller, please email dataprivacy@halved.io and provide enough information to identify yourself, the right you want to exercise and the personal data to which your request relates. Halved may request additional information if reasonably needed to verify your identity.

Halved will respond to valid rights requests without undue delay and normally within one month, subject to any extension permitted by UK GDPR for complex requests. Where Halved is processor for a school, Halved will assist the school in responding to validated requests.

How to complain

You have the right to make a complaint to us if you are unhappy about how we handle your personal data. You can contact us at dataprivacy@halved.io. We will acknowledge your complaint within 30 days of receiving it and, without undue delay, will take appropriate steps to investigate, keep you informed and tell you the outcome. Full details of how we

handle data protection complaints are set out in our Data Protection Complaints Process, available on our website. A Data Protection Complaint Form is also available there or on request from dataprivacy@halved.io.

You also have the right to complain to the Information Commissioner's Office, the UK supervisory authority for data protection. The ICO can be contacted through <https://www.ico.org.uk> or by telephone on 0303 123 1113.

Do we review this policy?

We review this privacy notice at least once a year, and sooner when our practices change or when required by law. The next scheduled review is June 2027. We will notify schools of material changes affecting school-controlled personal data in accordance with the school DPA. When Halved makes significant changes, it will take appropriate steps to inform schools and, where relevant, website users, for example by notifying school contacts or publishing a notice on the Halved website.

Do you need extra help?

If you would like this notice in another format, such as large print, audio, accessible HTML or another language, please contact dataprivacy@halved.io.

Questions about data protection? dataprivacy@halved.io

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

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