

ACARISE LTD

Privacy Policy

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Effective Date	January 2025
Company No.	16831261
Registered Address	283 Uxbridge Road, W12 9DT, London
Contact	privacy@acarise.com
Jurisdiction	England & Wales (UK GDPR / DPA 2018)

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1. Who We Are

Acarise Ltd (“Acarise”, “we”, “us”, “our”) is a company registered in England and Wales (**Company No. 16831261**), with its registered office at **283 Uxbridge Road, W12 9DT, London**.

We operate an AI-assisted educational platform designed to support schools, multi-academy trusts (MATs), and private tutors in delivering personalised learning to students — primarily those preparing for **GCSEs** and **A-Levels** in the United Kingdom. Our platform is accessible globally.

Data Controller: Acarise Ltd

Email: privacy@acarise.com

ICO Registration Number: *[To be inserted upon registration]*

Website: www.acarise.com

Where we process personal data, we do so in accordance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and equivalent legislation in other jurisdictions where relevant.

2. Scope of This Policy

This Privacy Policy explains:

- What personal data we collect and why
- How we use, store, and protect that data
- Who we share it with and on what legal basis
- How long we retain it
- Your rights and how to exercise them

This policy applies to all users of the Acarise platform including students, teachers, tutors, school administrators, parents or guardians, and any individual whose data is processed in connection with our services.

3. The Data We Collect

3.1 Students

- Name and year group
- School or tutor organisation
- Session activity and responses (written tasks, quiz answers, AI conversation logs)
- Progress and performance data generated by the platform
- Account login credentials (managed by school or tutor)

3.2 Teachers and School Administrators

- Name and job title
- School name and contact email
- Assignment and session configuration data
- Platform usage and reporting activity

3.3 Private Tutors

- Name, contact email, and business details
- Student session records (where applicable)
- Billing and subscription information
- Platform usage data

3.4 Technical and Usage Data

- Device type and browser information
- IP address
- Session timestamps and activity logs
- Cookies and analytics data (see Section 11)

4. How We Collect Data

We collect data:

- Directly from users when they register or use the platform

- From schools and tutors who create accounts on behalf of students
- Automatically through platform usage (logs, cookies, session data)
- From third-party integrations where a school or organisation connects an existing system to Acarise

5. Why We Use Your Data (Lawful Bases)

Under UK GDPR, we rely on the following lawful bases:

Lawful Basis	Purpose
Contract	Delivering the platform and services subscribed to
Legitimate Interests	Improving the platform, detecting abuse, security
Legal Obligation	Compliance with applicable laws and regulations
Consent	Marketing communications and optional analytics
Vital Interests	Safeguarding and child protection where required

We do not sell personal data to third parties under any circumstances.

6. How We Use Your Data

We use the data we collect to:

- Provide, maintain, and improve the Acarise platform
- Personalise learning experiences for students
- Generate progress reports and insights for teachers and tutors
- Process billing and manage subscriptions
- Communicate with you about your account, updates, and support
- Ensure the safety and security of the platform and its users
- Meet our legal and regulatory obligations

- Comply with safeguarding duties where applicable

7. Who We Share Your Data With

We may share data with trusted third parties solely for the purposes described in this policy:

- **Cloud infrastructure providers** — hosting and data storage
- **AI model providers** — to power the personalised learning engine (under strict data processing agreements)
- **Payment processors** — billing and subscription management
- **Analytics providers** — platform improvement (anonymised or aggregated where possible)
- **Legal and regulatory authorities** — where required by law

All third-party processors are bound by contractual obligations consistent with UK GDPR. We do not allow third parties to use your data for their own marketing or commercial purposes.

8. International Data Transfers

Where we transfer personal data outside the United Kingdom, we ensure appropriate safeguards are in place, including:

- Transfers to countries with UK adequacy decisions
- Standard Contractual Clauses (SCCs) approved by the ICO
- Binding Corporate Rules where applicable
- International Data Transfer Agreements (IDTAs)

Important: Users outside the UK should be aware that their data may be transferred to and processed in the United Kingdom, which has its own data protection regime under the UK GDPR and Data Protection Act 2018.

9. Data Retention

We retain personal data only for as long as necessary.

Data Type	Retention Period
Student session data	Active subscription + 12 months
Teacher / tutor account data	Active account + 24 months
Billing records	7 years (UK financial regulation)
Support correspondence	3 years from resolution
Marketing consent records	Until withdrawn + 12 months
Safeguarding records	As required by applicable law

After these periods, data is securely deleted or anonymised.

10. Your Rights

Under UK GDPR, you have the following rights:

- **Right of Access** — Request a copy of the data we hold
- **Right to Rectification** — Ask us to correct inaccurate data
- **Right to Erasure** — Request deletion in certain circumstances
- **Right to Restriction** — Ask us to limit how we use your data
- **Right to Portability** — Receive your data in a machine-readable format
- **Right to Object** — Object to processing based on legitimate interests or direct marketing
- **Automated Decision Making** — Not to be subject to solely automated decisions with significant effects

To exercise any of these rights, contact us at privacy@acarise.com. We will respond within **30 days**.

11. Cookies

We use cookies and similar tracking technologies to operate and improve the platform:

- **Essential cookies** — Required for login sessions and security
- **Performance cookies** — Anonymised analytics
- **Preference cookies** — Remember your settings

- **Marketing cookies** — Used only with explicit consent

A full Cookie Policy is available at www.acarise.com/cookies.

12. Automated Decision Making and AI

Acarise uses artificial intelligence to personalise learning, generate questions, and surface progress insights.

Our commitment: We do not make solely automated decisions with legal or similarly significant effects on learners. All meaningful outcomes are reviewed by a human educator. AI-generated content is a learning tool and does not constitute formal academic results.

13. Security

We apply technical and organisational measures to protect your data:

- Encryption of data in transit and at rest
- Role-based access controls
- Regular security testing and penetration testing
- Staff training on data protection and safeguarding
- Incident response procedures aligned to ICO requirements

Data Breach Notification: In the event of a breach likely to result in risk to individuals, we will notify the ICO within **72 hours** and affected individuals without undue delay, in accordance with Articles 33 and 34 of the UK GDPR.

14. Children's Privacy

Our platform is primarily used by students aged **14–18**. We do not knowingly collect data from children under 13 without verified parental or guardian consent. All student accounts are provisioned by schools or tutors, who are responsible for ensuring appropriate consent is in place.

15. Complaints

If you are unhappy with how we have handled your data, contact us first:

Email: privacy@acarise.com

We aim to respond within **14 working days**.

If you remain dissatisfied, you have the right to complain to the **Information Commissioner's Office (ICO)**:

- **Website:** ico.org.uk
- **Helpline:** +44303 123 1113
- **Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

16. Changes to This Policy

We will update this policy to reflect changes in our practices or legal requirements. Material changes will be communicated via email or in-platform notification. The current version is always available at www.acarise.com/privacy.

17. Contact Us

Acarise Ltd

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This policy was last reviewed in January 2025. Version 1.0.

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