



POLICY

Privacy Policy

What personal data Acarise handles, who decides what happens to it, who else sees it, how long we keep it, and how to exercise your rights.

VERSION	EFFECTIVE FROM
2.0	23 September 2026
APPLIES TO	OWNER
Everyone who uses Acarise	Acarise Ltd
NEXT REVIEW	CLASSIFICATION
23 September 2027	Public

Acarise Ltd · Company No. 16831261 · 283 Uxbridge Road, London W12 9DT · contact@acarise.com

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1. Who we are

Acarise Ltd (“Acarise”, “we”, “us”, “our”) is a company registered in England and Wales, company number 16831261, with its registered office at 283 Uxbridge Road, London W12 9DT.

We make software that turns a teacher’s learning objective into an activity a student works through in conversation with an AI tutor, which the product calls simply Acarise, and that reports the student’s progress back to the teacher. We sell it to schools, multi-academy trusts and individual educators.

We handle personal data under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

ONE ADDRESS

Everything to do with this policy — questions, rights requests, complaints — goes to contact@acarise.com. We do not use any other address.

Acarise Ltd's registration with the Information Commissioner's Office is in progress. We will publish the registration number here, and update the version of this policy, when it is issued.

2. Who decides what happens to the data

This is the part schools care about most, so it comes before everything else. The answer is different for different data, and the difference matters.

Data	Controller	Our role
Student accounts, their work, their conversations with the tutor, and their progress — where a school or educator set the student up	The school or educator	Processor. We act on their instructions.
Educator accounts, billing, and our own records of how the product is used	Acarise	Controller
Enquiries you send us directly	Acarise	Controller

In plain terms: **a school's pupil data is the school's**. We hold it and process it so the product works, on the school's instructions, and we do not decide to use it for our own purposes. If a school asks us to export or delete its pupil data, we do it.

Where we act as a processor, the school remains responsible for the lawful basis on which pupils' data is used, for telling pupils and their parents about it, and for handling rights requests — though we will help with any request a school passes to us. We enter into a written data processing agreement with each school on request; write to contact@acarise.com.

3. What we collect

3.1 Students

- Name and email address. That is all a student account is created with.
- A passphrase for signing in, stored in hashed form. We never see or store it in readable form.
- Everything the student writes to the tutor inside an activity, and everything it writes back.
- Quiz answers and quiz scores.
- Progress the platform works out from the conversation: the status and confidence recorded against each learning objective.
- Which groups and activities the student belongs to.

WHAT WE DO NOT COLLECT FROM STUDENTS

We do not ask for or store a date of birth, an age, a year group, a home address, a phone number, a photograph or any special category data. We do not ask students to verify their age.

3.2 Educators and administrators

- First name, last name and email address.
- A password, stored in hashed form.
- The groups, activities and settings they create.
- Billing and subscription details, where a paid subscription exists.
- Anything they send us through the in-product feedback form.

3.3 Technical data

- Device and browser information, and IP address, in server logs.
- Session timestamps and error records.
- Aggregate page analytics, which are not tied to a named individual — see section 10.

4. How we collect it

- Directly, when an educator signs up or a student accepts an invite link.
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- From schools and educators, who create groups and assign activities.
- Automatically, as the product runs — conversations, quiz results and progress are generated by use.

5. Why we use it, and on what basis

Where Acarise is the controller (see section 2), we rely on these lawful bases.

Lawful basis	What we rely on it for
Contract	Providing the product to the school or educator who subscribed to it.
Legitimate interests	Keeping the service secure, investigating misuse, fixing faults, and improving the product.
Legal obligation	Meeting our obligations under tax, accounting and data protection law.
Consent	Marketing emails, where you have asked for them. You can withdraw at any time.

Where a school is the controller, the lawful basis for processing pupil data is the school's to determine. We process that data on the school's documented instructions.

We do not sell personal data, and we never have.

We use the data we hold to:

- Run the platform and keep accounts working.
- Generate activities, run conversations with the tutor, and score quizzes.
- Show educators how their students are progressing.
- Take payment and manage subscriptions.
- Answer support requests and act on feedback.
- Keep the service secure and investigate misuse.
- Meet our legal obligations.

6. Who else sees it

We use a small number of suppliers to run the product. Each one is bound by a written contract, may only act on our instructions, and may not use the data for its own purposes.

OUR SUB-PROCESSORS

Supplier	What it does	What it receives	Where
Vercel	Hosts the application and serves it to browsers	All data in transit; server logs; IP addresses	US
Supabase	Database and sign-in	All stored data: accounts, conversations, quiz results, progress	EU
OpenAI	Runs the tutor, the progress analyser, and activity and quiz generation	Conversation content and activity content, as each request is made	US
Langfuse	Records each AI request so we can monitor quality and diagnose faults	Copies of the text sent to and returned from the AI, including student messages	EU
Resend	Sends transactional email, such as password resets	Name and email address	US
Vercel Analytics	Counts page views	Aggregate page data. No cookies and no named individuals.	US

WORTH SAYING PLAINLY

Two of these receive what students write. **OpenAI** receives it in order to generate the tutor's reply — under our agreement, it is not used to train their models. **Langfuse** receives a copy so we can see what the AI was asked and what it answered when something goes wrong. If that is not acceptable to your school, tell us before you deploy.

We will also disclose data where the law requires it, or to protect someone's safety.

7. Where it goes

Some of our suppliers are in the United States, as the table above sets out. Where personal data leaves the UK we rely on the UK's International Data Transfer Agreement, or the UK Addendum to the European Commission's Standard Contractual Clauses, together with the supplier's own technical measures.

Suppliers in the EU are covered by the UK's adequacy decision for the EEA.

8. How long we keep it

Data	Kept for
Student accounts, conversations, quiz results and progress	As long as the school's subscription runs, then 12 months, unless the school asks us to delete it sooner. A school may ask for deletion or export at any time.
Educator accounts and their content	As long as the account is active, then 24 months.
AI request records held by Langfuse	As long as they remain useful for diagnosing faults, and deleted with the workspace they belong to.
Billing records	7 years, as UK tax law requires.
Support correspondence	3 years from resolution.
Marketing consent records	Until consent is withdrawn, then 12 months.
Server logs	As retained by our hosting provider for operational purposes.

After these periods data is deleted or irreversibly anonymised.

Activities that an educator archives are hidden from students but not deleted. There is no delete function for activities in the product today. A school that wants archived material removed should ask us.

9. Your rights

Under the UK GDPR you have the right to:

Access

Ask for a copy of the personal data we hold about you.

Rectification

Ask us to correct data that is wrong or incomplete.

Erasure

Ask us to delete data, in the circumstances the law allows.

Restriction

Ask us to stop using data while a question about it is resolved.

Portability

Receive data you gave us in a machine-readable form.

Objection

Object to processing we base on legitimate interests, and to direct marketing at any time.

Not to be subject to automated decisions

See section 11.

Write to contact@acarise.com. We will respond within one month, as the UK GDPR requires.

STUDENTS AND PARENTS

If a student's account was set up by a school, the school is the controller for that data, so a request about it should go to the school first. If you send it to us, we will pass it on and help the school answer it.

10. Cookies

We use cookies only to keep you signed in. We set no advertising cookies, and we allow no third-party tracking cookies. Our page analytics do not use cookies at all.

The detail is in our **Cookie Policy**, published alongside this one.

11. AI, and decisions about learners

Acarise uses AI models from OpenAI to hold the conversation, to generate activities and quiz questions, and to judge from the conversation whether a learning objective has been met.

OUR COMMITMENT

Acarise produces no formal academic result, no grade that counts, and no decision with a legal or similarly significant effect on a learner. What the platform records is information for a teacher, and the teacher decides what it means. AI-generated content is a teaching tool, and it can be wrong.

Every conversation carries the line: "AI-generated responses may contain inaccuracies. Always verify with trusted sources."

Quiz scoring is not AI. Quizzes are marked by our server against a stored answer key, which never reaches the browser. The pass mark is fixed at 80%.

12. Security

The measures we have in place today:

- Data is encrypted in transit and at rest by our hosting and database providers.
- Roles are assigned on the server and cannot be changed from a browser. Educator screens and APIs are closed to students.
- An action on a student, such as a password reset, is only permitted for an educator whose group that student is in.
- Database access is restricted by row-level security policies.
- Passwords and passphrases are stored hashed, never in readable form.
- Quiz answer keys are held server-side and used only for scoring.

WHAT WE DO NOT CLAIM

Acarise has not yet commissioned an independent penetration test or a third-party security certification. We will say so here when that changes rather than implying otherwise.

If **there is a breach** that is likely to result in a risk to people, we will report it to the ICO within 72 hours and tell affected individuals without undue delay, as Articles 33 and 34 of the UK GDPR require. Where we are a processor, we will tell the school without undue delay so it can meet its own obligations.

13. Children's data

Acarise is built for school use and supports learners from Kindergarten to Class 12 and college level. Many of the people whose data we handle are children.

- **Student accounts are created by a school or educator**, not by children signing themselves up. The school is responsible for having the appropriate basis and consents in place, and for telling pupils and parents that Acarise is being used.
- We collect the minimum we can: a name and an email address. No age, no date of birth, no year group.
- Because we do not collect age, **we cannot verify how old a user is**. We rely on the school to decide that Acarise is appropriate for its pupils.
- We do not profile children for marketing, and we send no marketing to student accounts.

Our Safeguarding Policy explains what the platform does and does not do when a child writes something concerning. Please read it alongside this policy.

14. Complaints

Tell us first, at contact@acarise.com. We aim to respond within 14 working days.

If you are still unhappy you can complain to the Information Commissioner's Office:

Online

ico.org.uk

By post

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Complaining to us first does not affect your right to go to the ICO at any time.

15. Changes to this policy

We update this policy when our practices or the law change. Where a change is material we will tell you by email or in the product, and we will raise the version number. Because acceptance is recorded against the version, a new version means we will ask you to read and accept it again.

VERSION HISTORY

Version	Date	Change
2.0	23 September 2026	Rewritten. Added the controller and processor split; named every sub-processor and what it receives; disclosed AI request recording; corrected the description of student data and the age range; removed claims about security testing that were not accurate; moved cookies to a separate policy; single contact address.
1.0	January 2025	First issue.

OWNER

Acarise Ltd

CONTACT

contact@acarise.com

NEXT REVIEW

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