



FOR SCHOOLS AND TRUSTS

# Everything you need to assess us

Nine documents, who should read which, and the facts your DPO needs to start a DPIA — on one page, so nobody has to read all nine to begin.

|                              |                   |
|------------------------------|-------------------|
| VERSION                      | ISSUED            |
| 1.0                          | 23 September 2026 |
| AUDIENCE                     | OWNER             |
| School and trust procurement | Acarise Ltd       |
| NEXT REVIEW                  | CLASSIFICATION    |
| 23 September 2027            | Public            |

## 1. What is in the pack

| Document                          | Who it is for                                                  | Status |
|-----------------------------------|----------------------------------------------------------------|--------|
| Privacy Policy                    | DPO. Starts with who controls what — read section 2 first.     | v2.0   |
| Data Processing Agreement         | DPO and whoever signs. Article 28 terms, sub-processors, TOMs. | Draft  |
| Safeguarding Policy               | DSL. Read section 3 before deploying to pupils.                | v2.0   |
| AI Transparency Statement         | Senior leadership and DSL. What the AI decides and gets wrong. | v1.0   |
| Information Security Overview     | IT or network manager. Includes what we do not have.           | v1.0   |
| Accessibility Statement           | SENCO. Includes known barriers.                                | v1.0   |
| Acceptable Use Policy             | Everyone. Also does the job of terms of service.               | v2.0   |
| Cookie Policy                     | DPO. Short — there is very little to say.                      | v1.0   |
| Teacher and student starter packs | The staff who will actually use it, and their classes.         | v1.0   |

## 2. DPIA inputs

Your school is the controller, so the DPIA is yours to write. These are the answers you would otherwise have to dig for.

|                                  |                                                                                                                                                                                                 |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Processor</b>                 | Acarise Ltd, company number 16831261, England and Wales.                                                                                                                                        |
| <b>ICO registration</b>          | In progress. We will confirm the number when issued.                                                                                                                                            |
| <b>Nature of processing</b>      | Hosting; AI-generated learning activities; a written conversation between pupil and AI tutor; AI assessment of progress against objectives; server-side quiz marking; reporting to the teacher. |
| <b>Data subjects</b>             | Pupils, and teaching and admin staff.                                                                                                                                                           |
| <b>Pupil data collected</b>      | Name; email; hashed passphrase; full conversation text; quiz answers and scores; per-objective progress and confidence; group and activity membership.                                          |
| <b>Not collected</b>             | Date of birth, age, year group, address, phone number, photograph. No age verification.                                                                                                         |
| <b>Special category data</b>     | None requested or designed for. A pupil writing freely could disclose some — account for this.                                                                                                  |
| <b>Automated decision-making</b> | No decision with legal or similarly significant effect. No grade that counts.                                                                                                                   |
| <b>Sub-processors</b>            | Vercel (US), Supabase (EU), OpenAI (US), Langfuse (EU), Resend (US), Vercel Analytics (US).                                                                                                     |
| <b>Model training</b>            | No pupil data is used to train any AI model.                                                                                                                                                    |
| <b>Transfers outside the UK</b>  | Yes — UK IDTA or the UK Addendum to the SCCs; EU suppliers under UK adequacy.                                                                                                                   |
| <b>Retention</b>                 | Subscription term + 12 months, or sooner on your instruction.                                                                                                                                   |
| <b>Breach notification</b>       | To you, without undue delay and within 48 hours.                                                                                                                                                |
| <b>Data portability</b>          | Conversation export from the product at any time; full export on request.                                                                                                                       |

### 3. The three things to weigh

Rather than make you find these across nine documents, here they are together. Each is covered properly in the document named.

#### 1 • NO SAFEGUARDING DETECTION

Acarise does not scan pupil messages for signs of harm and raises no alert. A disclosure made to the tutor is stored and nobody is notified. The control is that teachers can read everything. A flagging feature is being built and is not available yet. **Safeguarding Policy, section 3.**

## 2 • PUPIL CONVERSATIONS REACH TWO THIRD PARTIES

OpenAI, to generate each reply, and Langfuse, which keeps a copy so we can diagnose faults. Both are covered by contract; neither trains on the content. If this is not acceptable, tell us before deploying.

**Privacy Policy, section 6.**

## 3 • ASSESSMENT FAVOURS WRITTEN FLUENCY

The analyser reads what a pupil writes, so a pupil who understands but writes briefly may not be marked as having met an objective. The evidence is always one click away and your teacher's judgement overrides the platform. **Accessibility Statement, known problems.**

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## 4. What we do not have

Collected here so it does not have to be discovered late.

- No independent penetration test.
- No Cyber Essentials or ISO 27001 certification.
- No multi-factor authentication and no single sign-on.
- No formal WCAG audit or assistive technology testing.
- No designated safeguarding lead at Acarise — we are a supplier; your DSL holds the duty.
- No configurable data residency.
- No content moderation or harm detection.
- ICO registration still in progress.

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## 5. Talking to us

Everything goes to [contact@acarise.com](mailto:contact@acarise.com) — questions on any document, a request for the Data Processing Agreement, or a DPIA review meeting.

If your procurement process needs an answer we have not given here, ask. A question we cannot answer honestly is one we would rather know about before you buy than after.

VERSION HISTORY

| Version | Date              | Change       |
|---------|-------------------|--------------|
| 1.0     | 23 September 2026 | First issue. |

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