



# Pocket Teacher Ltd

Company Number 10803888 Tynddole, St. Harmon, Rhayader, LD6 5NG, United Kingdom

30 January 2026

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## Website and Service Privacy Policy

### 1. INTRODUCTION

#### 1.1 Important information and who we are

Welcome to Pocket Teacher Ltd's Privacy and Data Protection Policy ("Privacy Policy").

At Pocket Teacher Ltd (trading as Exceas.ai) ("we", "us", or "our") we are committed to protecting and respecting your privacy and Personal Data in compliance with the United Kingdom General Data Protection Regulation ("GDPR"), the Data Protection Act 2018 and all other mandatory laws and regulations of the United Kingdom.

This Privacy Policy explains how we collect, process and keep your data safe. The Privacy Policy will tell you about your privacy rights, how the law protects you, and inform our employees and staff members of all their obligations and protocols when processing data.

The individuals from which we may gather and use data can include:

- Customers and website visitors
- School and Academy Trust staff using our ExamGPT service
- Pupils/students whose assessment work is processed through our service
- Third parties connected to your customers
- and any other people that the organisation has a relationship with or may need to contact.

This Privacy Policy applies to all our employees and staff members and all Personal Data processed at any time by us.



## 1.2 Your Data Controller and Our Role as Data Processor

For website visitors and direct customers: Pocket Teacher Ltd is your Data Controller and responsible for your Personal Data.

For schools and Academy Trusts using our ExamGPT service: The school or Academy Trust remains the Data Controller for all pupil and staff data processed through our service. Pocket Teacher Ltd (Exceas.ai) acts as a Data Processor, processing data only on the documented instructions of the school in accordance with our Data Processing Agreement.

We are registered with the Information Commissioner's Office (ICO).

Registration Detail	Reference
ICO Registration Number	ICO:000130013 92
ICO Security Number	CSN7464059

We comply with the requirements of: – UK General Data Protection Regulation (UK GDPR) – Data Protection Act 2018 – Data (Use and Access) Act 2025 – Department for Education guidance on data protection in schools – ICO guidance on AI and data protection

We are not obliged by the GDPR to appoint a data protection officer and have not voluntarily appointed one at this time. Therefore, any inquiries about your data should either be sent to us by email to [john@exceas.ai](mailto:john@exceas.ai) or by post to Tyndole, St. Harmon, Rhayader, LD6 5NG, United Kingdom.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 1.3 Processing data on behalf of a Controller and processors' responsibility to you

In discharging our responsibilities as a Data Controller (for our website and direct customers) and as a Data Processor (for schools using our ExamGPT service), we have employees who will deal with your data on our behalf (known as "Processors"). The responsibilities below may be assigned to an individual or may be taken to apply to the



organisation as a whole. The Data Controller and our Processors have the following responsibilities:

- Ensure that all processing of Personal Data is governed by one of the legal bases laid out in the GDPR (see 2.2 below for more information);
- Ensure that Processors authorised to process Personal Data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
- Implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk associated with the processing of Personal Data;
- Obtain the prior specific or general authorisation of the Controller before engaging another Processor;
- Assist the Controller in the fulfilment of the Controller's obligation to respond to requests for exercising the data subject's rights;
- Make available to the Controller all information necessary to demonstrate compliance with the obligations laid down in the GDPR and allow for and contribute to audits, including inspections, conducted by the Controller or another auditor mandated by the Controller;
- Maintain a record of all categories of processing activities carried out on behalf of a Controller;
- Cooperate, on request, with the supervisory authority in the performance of its tasks;
- Ensure that any person acting under the authority of the Processor who has access to Personal Data does not process Personal Data except on instructions from the Controller; and
- Notify the Controller without undue delay after becoming aware of a Personal Data Breach (within 24 hours for school customers).

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## 2. LEGAL BASIS FOR DATA COLLECTION

### 2.1 Types of data / Privacy policy scope

"Personal Data" means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together below. Not all of the following types of data will necessarily be



collected from you but this is the full scope of data that we collect and when we collect it from you:

For website visitors and direct customers:

- **Profile/Identity Data:** This is data relating to your first name, last name, gender, date of birth.
- **Contact Data:** This is data relating to your phone number, addresses, email addresses, phone numbers.
- **Marketing and Communications Data:** This is your preferences in receiving marketing information and other information from us.
- **Billing Data:** This is information relating to your debit and credit card information such as the name attached to your payment details and your billing address.

For schools using our ExamGPT service (pupil/student data):

- **Student Identity Data:** Student name, student ID, year group, class.
- **Assessment Data:** Scanned exam responses and written work uploaded for marking.
- **AI-Generated Data:** AI-suggested marks and feedback generated by our service.
- **Final Assessment Data:** Teacher's confirmed final marks.
- **Performance Data:** Learning patterns and gaps identified through analysis.

For school staff using our ExamGPT service:

- **Staff Identity Data:** Name, email address, school/organisation.
- **Authentication Data:** Password (stored in hashed format), session tokens.
- **Usage Data:** Service usage logs for security and support purposes.

We also collect, use and share Aggregated Data such as average amount of daily users and amount of exam scripts marked. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.

We may also aggregate data to enable research or analysis so that we can better understand and serve you and others. For example, we may conduct research on your demographics and usage. Although this aggregated data may be based in part on Personal Data, it does not identify you personally. We may share this type of anonymous data with others, including service providers, our affiliates, agents and current and prospective business partners.



We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. Our ExamGPT service is not designed to process special category data; however, if such data is inadvertently included in uploaded assessment materials, schools should contact us immediately.

## 2.2 The Legal Basis for Collecting That Data

There are a number of justifiable reasons under the GDPR that allow collection and processing of Personal Data. The main avenues we rely on are:

- "Consent": Certain situations allow us to collect your Personal Data, such as when you tick a box that confirms you are happy to receive email newsletters from us, or 'opt in' to a service.
- "Contractual Obligations": We may require certain information from you in order to fulfil our contractual obligations and provide you with the promised service.
- "Legal Compliance": We're required by law to collect and process certain types of data, such as fraudulent activity or other illegal actions.
- "Legitimate Interest": We might need to collect certain information from you to be able to meet our legitimate interests – this covers aspects that can be reasonably expected as part of running our business, that will not have a material impact on your rights, freedom or interests. Examples could be your address, so that we know where to deliver something to, or your name, so that we have a record of who to contact moving forwards.
- "Public Task": For schools, the processing of pupil assessment data may be necessary for the performance of a task carried out in the public interest (education).

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## 3. HOW WE USE YOUR PERSONAL DATA

### 3.1 Our data uses

We will only use your Personal Data when the law allows us to.



Set out below is a table containing the different types of Personal Data we collect and the lawful basis for processing that data. Please refer to section 2.2 for more information on the lawful basis listed in the table below.

Examples provided in the table below are indicative in nature and the purposes for which we use your data may be broader than described but we will never process your data without a legal basis for doing so and it is for a related purpose. For further inquiries please contact us.

Activity	Type of data	Legal Justification	Lawful basis for processing data
When a user signs up to an account to use our services.	Profile/Identity Data, Contact Data, Billing Data, Financial Data, Usage Data	Consent, Contractual Obligations, Legal Compliance, Legitimate Interest, Necessity	We need to process this data so that we know who and where to charge for the products you have purchased from us
When a school uses our ExamGPT service to process pupil assessments	Student Identity Data, Assessment Data, AI-Generated Data, Performance Data	Contractual Obligations (with school), Legitimate Interest, Public Task	We process this data on behalf of the school (as Data Processor) to provide AI-assisted marking services, identify learning gaps, and generate assessment reports
When school staff access the ExamGPT platform	Staff Identity Data, Authentication Data, Usage Data	Contractual Obligations, Legitimate Interest	We need to authenticate users, maintain platform security, and provide the contracted service

### 3.2 Marketing and content updates

You will receive marketing and new content communications from us if you have created an account and chosen to opt into receiving those communications. From time to time we may make suggestions and recommendations to you about goods or services that may be of interest to you.



### 3.3 Change of purpose

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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## 4. ARTIFICIAL INTELLIGENCE AND AUTOMATED PROCESSING

### 4.1 AI Models and Processing

Our ExamGPT service uses artificial intelligence to assist teachers with marking pupil assessments. The AI models we use include:

- Large Language Models (LLMs): Google Gemini and Anthropic Claude APIs for text analysis and mark suggestions
- Custom Models: Proprietary models developed by Exceas.ai for educational assessment
- Computer Vision Models: For converting handwritten work to text

### 4.2 How We Protect Data During AI Processing

When pupil work is processed by AI:

- Anonymisation: The first page of exam papers (typically containing student names) is ignored entirely by AI processing. Student work is converted to text and processed using internal database IDs and UUIDs, not student names.
- Zero-Retention APIs: Our external AI providers (Google, Anthropic) operate zero-retention enterprise APIs, meaning data sent to them is processed and immediately discarded—it is not stored or used for any other purpose.



- AI Training: Together with any identifiably linked data, including school, staff, and pupil data, is NOT used to train AI models, whether ours or our sub-processors but only when separated from the individual and anonymised'.

## 4.3 Human Oversight

All AI outputs are suggestions only. Teachers must review, verify, and confirm all AI-suggested marks before they are finalised. Our service does not make autonomous assessment decisions, and no decisions with legal or similarly significant effects are made automatically.

## 4.4 AI Output Safeguards

We implement safeguards to ensure appropriate AI outputs:

- AI suggestions are anchored to the school's provided mark schemes
- Teachers can modify, override, or reject any AI suggestion via export into csv/excel

## 4.5 Data Protection Impact Assessment

The ExamGPT service involves the use of AI technology and processing of children's data. Under UK GDPR Article 35, this type of processing requires a Data Protection Impact Assessment (DPIA).

**For schools using ExamGPT:** – Schools (as Data Controllers) are responsible for conducting their own DPIA – We provide comprehensive DPIA supporting documentation to all schools – Our assessment indicates that risks can be mitigated to acceptable levels – A copy of our DPIA information pack is available upon request To request DPIA documentation, contact us at [info@excelas.ai](mailto:info@excelas.ai).

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# 5. YOUR RIGHTS AND HOW YOU ARE PROTECTED BY US

## 5.1 Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:



- Right to be informed. You have a right to be informed about our purposes for processing your personal data, how long we store it for, and who it will be shared with. We have provided this information to you in this policy.
- Right of access. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it (also known as a "data subject access request"). See section 5.5 below for more details on how you can make a data subject access request.
- Right to rectification. You have a right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Right to erasure. You have the right to ask us to delete or remove personal data where there is no good reason for us continuing to process it, where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Right to object. You can object to the processing of personal data we hold about you. This effectively allows you to stop or prevent us from processing your personal data. Note that this is not an absolute right and it only applies in certain circumstances, for example:
  - (i) Where we are processing your personal data for direct marketing purposes.
  - (ii) Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
  - (iii) In some cases, we may continue processing your data if we can demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Right to restrict processing. You have the right to request the restriction or suppression of their personal data. Note that this is not an absolute right and it only applies in certain circumstances:
  - (i) If you want us to establish the data's accuracy.
  - (ii) Where our use of the data is unlawful but you do not want us to erase it.
  - (iii) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.



- (iv) You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Right to data portability. You have the right to request the transfer of your personal data to you or to a third party. If you make such a request, we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Rights relating to automated decision-making. You have the right not to be subject to a decision based solely on automated processing which produces legal or similarly significant effects. Our ExamGPT service does not make such decisions—all AI outputs require teacher review and confirmation.

If you wish to make a request under any of these rights, please contact us at [info@exceas.ai](mailto:info@exceas.ai).

For schools: We will assist schools in responding to data subject requests from pupils, parents, or staff within 10 business days of receiving the request.

## 5.2 Your control over Pocket Teacher Ltd's use of your Personal Data

You may delete your account at any time – this will remove your account page from our systems and our related software.

For requests to delete personally identifiable data, please contact us and we will action your request within 30 days.

You can access information associated with your account by logging into your account you created with us.

Your account information will be protected by a password for your privacy and security. You need to prevent unauthorised access to your account and personal information by selecting and protecting your password appropriately and limiting access to your computer or device and by signing off after you have finished accessing your account.

## 5.3 How Pocket Teacher Ltd protects customers' Personal Data

We are concerned with keeping your data secure and protecting it from inappropriate disclosure. We implement a variety of security measures to ensure the security of your Personal Data on our systems, including:



#### Technical Security Measures:

Measure	Implementation
Encryption at Rest	AES-256 encryption for all stored data
Encryption in Transit	TLS 1.2/1.3 (HTTPS) for all data transmission
Authentication	Auth0 with JWT (JSON Web Tokens) for secure session management
Network Security	Google Cloud Platform firewalls and Virtual Private Cloud (VPC)
Access Controls	Role-based access controls, automatic session timeout
Rate Limiting	API rate limiting to prevent abuse
CORS Restrictions	Whitelist-only cross-origin access
Expiring URLs	Time-limited URLs for PDF student reports
CSRF Protection	Cross-Site Request Forgery protection implemented

#### Organisational Security Measures:

Measure	Implementation
Staff Vetting	Enhanced DBS checks for all personnel with administrative access
Access Principle	Principle of Least Privilege (PoLP) – maximum N users with root access
Confidentiality	All staff bound by confidentiality obligations
Training	Mandatory annual data protection training for all staff
Monitoring	Daily system monitoring, monthly penetration testing

Any Personal Data collected by us is only accessible by a limited number of employees who have special access rights to such systems and are bound by obligations of confidentiality. If and when we use subcontractors to store your data, we will not relinquish control of your Personal Data or expose it to security risks that would not have arisen had the data



remained in our possession. However, unfortunately no transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under the control of Pocket Teacher Ltd to intercept or access transmissions or private communications unlawfully. While we strive to protect your Personal Data, we cannot ensure or warrant the security of any Personal Data you transmit to us. Any such transmission is done at your own risk. If you believe that your interaction with us is no longer secure, please contact us.

#### 5.4 Opting out of marketing promotions

You can ask us to stop sending you marketing messages at any time by emailing [info@exceas.ai](mailto:info@exceas.ai) with "OPT OUT" to stop marketing at any time.

Where you opt out of receiving these marketing messages, we will continue to retain other Personal Data provided to us as a result of interactions with us not related to your marketing preferences.

#### 5.5 How to request your data and the process for obtaining it

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, if your request is clearly unfounded, we could refuse to comply with your request.

We may need to request specific information from you to help us confirm your identity and ensure you have the right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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### 6. YOUR DATA AND THIRD PARTIES

#### 6.1 Sub-processors

We use the following sub-processors to help deliver our services:

Sub-Processor	Purpose	Location	Data Processed



Google Cloud Platform	Cloud infrastructure hosting	UK/EU	All system data
Google (Gemini API)	AI language model processing	US (API)	Anonymised text content only (zero-retention)
Anthropic (Claude API)	AI language model processing	US (API)	Anonymised text content only (zero-retention)
Auth0 (Okta)	Authentication services	EU/US	User authentication credentials
Wonde	MIS data integration (where enabled)	UK	Student roster data

All sub-processors are bound by written data processing agreements and provide equivalent data protection guarantees. We will notify customers of any material changes to sub-processors.

## 6.2 Sharing your data with third parties

We may also share Personal Data with interested parties in the event that Pocket Teacher Ltd anticipates a change in control or the acquisition of all or part of our business or assets or with interested parties in connection with the licensing of our technology.

If Pocket Teacher Ltd is sold or makes a sale or transfer, we may, in our sole discretion, transfer, sell or assign your Personal Data to a third party as part of or in connection with that transaction. Upon such transfer, the Privacy Policy of the acquiring entity may govern the further use of your Personal Data. In all other situations your data will still remain protected in accordance with this Privacy Policy (as amended from time to time).

We may share your Personal Data at any time if required for legal reasons or in order to enforce our terms or this Privacy Policy.

We do not sell your Personal Data to third parties.

We do not share identifiable school, staff, or pupil data with third parties for their own purposes.

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## 7. HOW LONG WE RETAIN YOUR DATA

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for.

Specific retention periods:

Data Type	Retention Period
School assessment data (ExamGPT)	5 years from contract date, then securely deleted
Student records	5 years from contract date
User account data	Duration of account plus 2 years, or until deletion requested
Audit and security logs	2 years

We may retain your Personal Data for a longer period than usual in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

End of contract/trial: Upon termination of a service agreement with a school, we will if asked:

- Provide data export in standard formats upon request
- Securely delete all school data within 30 days
- Provide written confirmation of deletion upon request

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## 8. INTERNATIONAL TRANSFER OF DATA

### 8.1 Data hosting locations

Component	Location
Primary databases	United Kingdom
Application servers	United Kingdom



Worker/processing servers	Belgium (European Economic Area)
Backup storage	United Kingdom

## 8.2 International transfers

Your data is stored within the United Kingdom and European Economic Area (EEA).

When anonymised data is sent to AI APIs (Google Gemini, Anthropic Claude) located in the United States:

- Only anonymised text content is transmitted (no student names or identifiable information)
- Both providers operate zero-retention enterprise APIs—data is processed and immediately discarded
- Appropriate safeguards are in place including Standard Contractual Clauses (SCCs) and the EU-US Data Privacy Framework

Any transfer of data outside the UK/EEA for storage shall only occur with explicit written consent from the customer and must comply with UK GDPR requirements.

By using Pocket Teacher Ltd services, you acknowledge and consent to data being processed as described in this policy.

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## 9. DATA BREACH NOTIFICATION

In the event of a personal data breach:

- We will notify affected school customers within 24 hours of becoming aware of the breach
- We will provide detailed information about the nature of the breach, records concerned, likely consequences, and remedial actions taken
- We will assist schools in meeting their obligation to notify the ICO (within 72 hours where required) and affected data subjects

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## 10. NOTIFICATION OF CHANGES AND ACCEPTANCE OF POLICY

We keep our Privacy Policy under review and will place any updates here. This version is dated 30 January 2026.

By using Pocket Teacher Ltd services, you consent to the collection and use of data by us as set out in this Privacy Policy. Continued access or use of Pocket Teacher Ltd will constitute your express acceptance of any modifications to this Privacy Policy.

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## 11. INTERPRETATION

All uses of the word "including" mean "including but not limited to" and the enumerated examples are not intended to in any way limit the term which they serve to illustrate. Any email addresses set out in this policy may be used solely for the purpose for which they are stated to be provided, and any unrelated correspondence will be ignored. Unless otherwise required by law, we reserve the right to not respond to emails, even if they relate to a legitimate subject matter for which we have provided an email address. You are more likely to get a reply if your request or question is polite, reasonable and there is no relatively obvious other way to deal with or answer your concern or question (e.g. FAQs, other areas of our website, etc.).

Our staff are not authorised to contract on behalf of Pocket Teacher Ltd, waive rights or make representations (whether contractual or otherwise). If anything contained in an email from a Pocket Teacher Ltd address contradicts anything in this policy, our terms or any official public announcement on our website, or is inconsistent with or amounts to a waiver of any Pocket Teacher Ltd rights, the email content will be read down to grant precedence to the latter. The only exception to this is genuine correspondence expressed to be from the Pocket Teacher Ltd legal department.

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## 12. CONTACT US

For any questions about this Privacy Policy or our data practices:



Contact Method	Details
Email	info@exceas.ai
Post	Tynddole, St. Harmon, Rhayader, LD6 5NG, United Kingdom
ICO Registration	ICO:00013001392