

APPLICATION PRIVACY NOTICE

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1.0 INTRODUCTION

TeachScribe Ltd (“TeachScribe”, “we”, “us” or “our”) takes the protection of personal data very seriously and processes personal data in accordance with applicable UK data protection law, including the UK GDPR and the Data Protection Act 2018.

TeachScribe Ltd is incorporated and registered in England and Wales with company number 14754189 and registered office at Arding & Hobbs, 7 St. John’s Road, London, England, SW11 1QN.

This privacy notice explains how personal data is processed through the TeachScribe application when TeachScribe provides services to schools and other education settings.

This privacy notice applies to:

- school key contacts;
- teachers and support staff;
- students/pupils; and
- parents/carers (where parent-facing features are enabled by the school).

If you have questions about this privacy notice, please contact us using the details in section 16.0.

In this privacy notice, “**Sub-Processor List**” means TeachScribe’s list of approved sub-processors, including processing locations and transfer safeguards, published at www.teachscribe.com/legal/sub-processors.

2.0 TEACHSCRIBE LTD ACTING AS DATA PROCESSOR

For the services covered by this notice, the school or education setting is the data controller and TeachScribe acts as data processor.

This means the controller decides why and how personal data is processed, including lawful basis and any required transparency notices and consents. TeachScribe processes personal data on documented instructions from the controller, except where applicable law requires otherwise.

If TeachScribe receives a request directly from a data subject in relation to school-controlled data, TeachScribe will normally direct the request to the relevant controller and assist that controller in responding as required under contract and law.

3.0 WHY WE PROCESS PERSONAL INFORMATION

TeachScribe processes personal data on documented instructions from the controller to provide, operate, secure, support and improve the service, and to comply with applicable legal obligations.

Processing purposes typically include:

- user and account administration for schools, staff, students/pupils, and parents/carers where enabled by the controller;
- collection, organisation, storage, retrieval and presentation of educational observations and related records, including associated text, audio, photographs and videos provided through the service;

- AI-assisted service functions such as transcription, summarisation, categorisation and reporting support within the service;
- linking educational records to students/pupils and learning goals;
- integrations and data exchange with school systems where configured by the controller;
- service operations including customer support, troubleshooting, diagnostics, debugging, security monitoring, incident management and performance management;
- assisting the controller with compliance activities connected to the service, including support for valid data subject rights requests and lawful disclosures where required.

These processing purposes are illustrative and not exhaustive. The specific processing carried out depends on the controller's documented instructions, service configuration, enabled features and integrations.

TeachScribe does not process school-controlled personal data for purposes that are incompatible with the purposes described in this notice, except where required by applicable law.

4.0 LAWFUL BASIS AND SPECIAL CATEGORY DATA

For processing covered by this notice, the controller is responsible for identifying and documenting the lawful basis under Article 6 UK GDPR.

Where special category data is processed, the controller is responsible for identifying and documenting the applicable condition under Article 9 UK GDPR and, where required, Schedule 1 Data Protection Act 2018.

TeachScribe processes personal data only on documented controller instructions and in accordance with its processor obligations.

5.0 WHAT INFORMATION WE PROCESS AND WHERE IT COMES FROM

Personal data is provided to TeachScribe primarily by schools and their authorised users as part of normal service use. Data may also come from integrations enabled by the school.

The categories of personal data processed may include, depending on the controller's configuration and enabled features:

- **School key contacts and staff:** identifiers and contact details (such as name, work email address, phone number and job title), account and role information, and account activity or authentication logs;
- **Students/pupils:** profile details (such as name, date of birth, age and gender where provided), educational observations and assessments, learning goals, teacher comments, transcripts, developmental notes and adjustments, and related content (including photos, videos and audio) entered by the controller;
- **Parents/carers:** identifiers and contact details, linked child information, account details, and content submitted through parent-facing features where enabled by the controller;
- **Technical and operational data:** service usage information, server and application logs, and diagnostic or security event data needed for service delivery, reliability and security.

5.1 Special Category Data

Depending on the school's use of the service and the information it chooses to record, TeachScribe may process special category data about students/pupils, including information relating to health, special educational needs, or developmental considerations where provided by the controller.

5.2 Sources of Personal Data

Personal data is provided through school account setup, user inputs in the application, and integrations configured by the controller.

6.0 HOW LONG WE KEEP INFORMATION

TeachScribe retains personal data only for as long as required to provide services to the controller and to meet contractual and legal requirements.

When instructed by the controller, TeachScribe deletes relevant personal data from active systems without undue delay. Remaining copies in backups are securely deleted within backup lifecycles, including deletion windows of up to 180 days where applicable, unless a longer period is required by law.

At contract end, personal data is returned or securely deleted in line with the controller's instruction and contractual terms.

7.0 SECURITY OF PERSONAL INFORMATION

TeachScribe implements appropriate technical and organisational measures to protect personal data, including access controls, encryption in transit and at rest, role-based permissions, logging, and monitoring.

Access to personal data is restricted to authorised personnel with a legitimate need to access it. Personnel are subject to confidentiality obligations and receive security and data protection training.

TeachScribe maintains incident management procedures. Where TeachScribe becomes aware of any accidental, unauthorised or unlawful processing of school-controlled personal data, or any personal data breach, TeachScribe notifies the controller without undue delay. Where personal data is lost or destroyed or becomes damaged, corrupted, or unusable, TeachScribe notifies the controller promptly and without undue delay and, in any event, within 48 hours. TeachScribe supports the controller's response.

8.0 CHILDREN'S INFORMATION

TeachScribe processes personal data about children/pupils on controller instructions.

The controller is responsible for complying with legal requirements relating to children's data, including transparency obligations and any required parental authorisation or consent.

9.0 YOUR INDIVIDUAL RIGHTS

Individuals have rights under UK GDPR, including rights to be informed, access, rectification, erasure, restriction, objection, data portability, and rights related to automated decision-making.

For school-controlled data processed through TeachScribe, requests to exercise these rights should be made to the relevant school or education setting (the controller) in the first instance.

TeachScribe assists controllers in responding to valid rights requests under applicable contractual and legal obligations.

If TeachScribe receives a rights request directly for school-controlled data, TeachScribe notifies the relevant controller without undue delay and, in any event, within 3 working days.

10.0 CONSENT

Where the controller relies on consent as its lawful basis for specific processing activities, the controller is responsible for obtaining and managing that consent, including handling withdrawal requests.

If consent is withdrawn, the controller instructs TeachScribe on any required changes to processing.

11.0 FAILURE TO PROVIDE PERSONAL INFORMATION

If required personal data is not provided, the controller may be unable to use certain service features or TeachScribe may be unable to provide some parts of the service.

12.0 AUTOMATED DECISION MAKING

TeachScribe provides AI-assisted features such as transcription and summarisation to support educational record keeping.

TeachScribe does not use personal data in this service to make solely automated decisions that produce legal effects or similarly significant effects on individuals.

13.0 TRANSFERS TO THIRD PARTIES

TeachScribe may disclose personal data to third-party recipients where necessary to provide the service and meet legal obligations. Categories of recipients include:

- cloud infrastructure and hosting providers;
- identity and authentication providers;
- customer support and communication providers;
- monitoring and analytics providers used for service reliability and security;
- professional advisers and competent authorities where disclosure is required by law.

All such recipients are subject to contractual, confidentiality and security controls appropriate to their role. TeachScribe does not sell school-controlled personal data or share it for third-party advertising. Any use of data for service improvement is carried out in line with applicable law, contractual commitments and the controller's instructions.

The current named sub-processor list, including processing locations and transfer safeguards, is set out in the Sub-Processor List.

14.0 TRANSFERS OUTSIDE THE UNITED KINGDOM

Personal data is primarily processed in the UK and EEA. Processing outside the UK takes place only through controller-approved arrangements set out in the Sub-Processor List.

Where personal data is transferred outside the UK, TeachScribe applies appropriate safeguards required by UK data protection law and contractual commitments. Depending on the transfer,

these safeguards may include UK adequacy regulations, the UK International Data Transfer Agreement (IDTA), or the UK Addendum to EU Standard Contractual Clauses.

For further information on international transfers and safeguards, please contact us using the details in section 16.0 or contact your school/controller.

15.0 RIGHT TO COMPLAIN

If you have concerns about how personal data is handled, please raise this with the relevant school/controller first, or with TeachScribe using the details in section 16.0.

You also have the right to complain to the Information Commissioner's Office (ICO):

- Website: <https://ico.org.uk/make-a-complaint/>
- Phone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

16.0 ADDITIONAL INFORMATION

For questions about this privacy notice or TeachScribe's processing activities, contact:

- Email: office@teachscribe.com
- Post: TeachScribe Ltd, Arding & Hobbs, 7 St. John's Road, London, England, SW11 1QN

17.0 POLICY REVIEW AND AMENDMENTS

We keep this privacy notice under regular review and publish the current version with its last updated date.

This privacy notice is a transparency notice and does not amend the EULA, Services Agreement, or Data Processing Agreement. It is not incorporated into those agreements and does not create contractual obligations.

If there is any inconsistency between this privacy notice and the EULA, Services Agreement, or Data Processing Agreement, the applicable contractual agreement prevails.

Where we make material changes to the categories of personal data, processing purposes, recipients, international transfer safeguards, or data subject rights information described in this notice, we will publish an updated version before those changes take effect and, where appropriate, provide additional notice to relevant controllers and affected individuals.

Where a proposed new processing purpose for school-controlled personal data is not covered by current controller instructions and contractual terms, TeachScribe will not commence that processing until the controller has provided documented instructions and the applicable contractual documentation has been updated where required.