Data Retention & Deletion Policy

SMID (by Prodeo Ltd)
Last updated: November 2026

1. Purpose of this policy

This Data Retention & Deletion Policy explains how Prodeo Ltd retains and deletes personal data processed within SMID, in line with UK data protection legislation and the instructions of schools using the platform.

This policy supports:

Data Protection Impact Assessments (DPIAs)

contractual obligations under the Data Processing Agreement

transparency and accountability requirements under UK GDPR

2. Roles and responsibilities

For the purposes of UK GDPR:

Schools are controllers for school-controlled SMID data and determine its purposes and retention instructions.

Prodeo acts as processor for that school data and retains or deletes it under the School's documented instructions and the DPA.

Separately, Prodeo is controller for limited staff contact details used for customer administration, relationship management and relevant feature-update marketing. Prodeo reviews those contacts periodically, keeps them while needed for the relationship, then deletes or suppresses them subject to legal record-keeping and retaining a minimal opt-out record.

3. General retention principles

Prodeo Ltd applies the following principles when retaining personal data:

data is retained only for as long as necessary

retention is linked to the duration of the school's contract

data is minimised wherever possible

deletion processes are designed to be secure and irreversible

no data is retained "just in case"

4. Retention during the contract

While a school has an active contract with Prodeo Ltd:

personal data is retained to allow the school to use SMID as intended

data remains accessible only to authorised users

backups are maintained to protect against accidental loss or system failure

Retention during this period is necessary to provide the service.

5. Retention after contract termination

When a school's contract ends:

the school may request an export of its data

access to SMID is removed

personal data is scheduled for secure deletion

Unless otherwise agreed or required by law, personal data is deleted from live systems and backups within three months of contract termination.

This short post-termination period allows for:

final data export requests

resolution of support queries

completion of secure deletion processes

6. Deletion processes

Deletion processes are designed to ensure that:

data is removed from active databases

data is removed from application environments

data is removed from backups in accordance with backup lifecycles

deletion actions are carried out securely and systematically

Prodeo Ltd uses cloud provider tools and internal procedures to support secure deletion.

7. Sub-processors and deletion

Prodeo Ltd uses a limited number of sub-processors to deliver SMID, including:

Amazon Web Services (AWS)

Heroku (Salesforce)

OpenAI (for the optional, user-initiated aggregate-only AI report-writing feature; pupil-identifying and individual learner data must not be submitted)

Sub-processors are contractually required to process data only for authorised purposes, retain it only as long as necessary, and delete it in line with contractual and legal requirements. Wonde is a separate processor of School Data under the School's agreement with Wonde; its retention and deletion obligations are governed by that agreement.

Where AI features are used:

data is submitted only at the user's request

Prodeo has configured the OpenAI API not to persist application responses beyond processing. OpenAI's published API guidance says abuse-monitoring logs may contain prompts and responses and are retained for up to 30 days by default

Data is not stored for training purposes

8. Early deletion requests

Schools may request deletion of personal data during the contract where appropriate.

Such requests will be handled:

in line with the school's role as Data Controller

subject to any legal or contractual requirements

within a reasonable timeframe

9. Legal and regulatory retention

In limited circumstances, Prodeo Ltd may be required to retain certain information for longer periods where required by law (for example, financial or audit records).

Such retention does not include pupil assessment data and is limited to what is strictly necessary.

10. Data subject rights

Requests from individuals (including pupils, parents or staff) relating to deletion or retention of personal data should normally be directed to the school as Data Controller.

Prodeo Ltd will assist schools in responding to such requests where required under the Data Processing Agreement.

11. Review of this policy

This policy is reviewed periodically and updated as necessary to reflect:

changes in the SMID service

changes in sub-processors

updates to legal or regulatory guidance

The most current version will be made available on request or via the SMID website.