

Data Retention & Deletion Policy

SMID (by Prodeo Ltd)

Last updated: February 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
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2. Roles and responsibilities

For the purposes of UK GDPR:

- **Schools** are the **Data Controllers** and determine what data is uploaded to SMID and how long it should be retained.
- **Prodeo Ltd** acts as a **Data Processor**, retaining and deleting data only in accordance with the School's instructions and contractual arrangements.

Prodeo Ltd does not independently determine retention periods for pupil data.

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"
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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
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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)
- Snowflake (secure data warehousing and analytics)
- Wonde (where authorised by the school)
- OpenAI (for optional, user-initiated AI features)

Sub-processors are contractually required to:

- process data only for authorised purposes
- retain data only for as long as necessary
- delete data in line with contractual and legal requirements

Where AI features are used:

- data is submitted only at the user's request
- retention is disabled
- 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.