

Privacy Notice

SMID (by Prodeo Ltd)

Last updated: February 2026

1. Who we are

SMID is a web-based assessment and tracking platform provided by **Prodeo Ltd**.

Prodeo Ltd is a company registered in England and Wales and provides SMID to UK schools to support assessment, tracking and reporting of pupil progress.

For the purposes of data protection law:

- **Schools** using SMID are the **Data Controller**
- **Prodeo Ltd** is the **Data Processor**, acting on the school's instructions

If you have any questions about this Privacy Notice or how SMID is used, you can contact us at:

Email: info@smidreport.com

2. Who this Privacy Notice is for

This Privacy Notice applies to:

- pupils (children under the age of 18)
- parents and carers
- school staff and authorised users
- anyone using or interacting with the SMID platform

Schools are responsible for providing their own privacy information to pupils and parents explaining how they use SMID as part of their educational duties.

3. What SMID does

SMID helps schools to:

- record and analyse assessment and attainment data
- monitor progress over time
- support reporting and educational planning

- reduce administrative workload for staff

SMID is used only within the UK education context and is provided exclusively to schools.

4. What personal data is processed

Depending on how a school uses SMID, the following types of personal data may be processed.

Pupils (children under 18)

- name or unique identifier
- class, year group or cohort
- assessment, attainment and progress data
- attendance or behaviour indicators (where enabled by the school)
- limited additional indicators such as SEND status, if provided by the school

School staff and authorised users

- name
- school email address
- user account and access details
- audit logs of system activity

SMID does **not** require schools to upload special category data as part of its core functionality. Schools are encouraged to minimise the personal data they upload and avoid including unnecessary or sensitive information.

5. How the data is collected

Personal data processed in SMID is:

- provided by the school, usually via its Management Information System (MIS), or
- entered directly by authorised school staff

Prodeo Ltd does not collect pupil data directly from pupils or parents.

6. Why the data is processed (purposes)

Schools use SMID to:

- fulfil their educational responsibilities
- monitor academic progress
- support teaching, learning and intervention
- improve the consistency and quality of assessment and reporting

Prodeo Ltd processes data only to provide and support the SMID service and does not use the data for its own independent purposes.

7. Lawful basis for processing

Schools rely on their lawful bases under UK GDPR, typically the **performance of a public task in the field of education**.

Prodeo Ltd processes personal data:

- on the documented instructions of the school
 - under a written Data Processing Agreement
 - in accordance with UK data protection law
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8. Use of AI features (including OpenAI)

SMID includes optional features that allow authorised users to submit text to an AI service to generate summaries.

Important points to note:

- AI features are **user-initiated** and only operate when a user chooses to use them
- Schools and users decide what information is entered
- Users are **strongly discouraged** from entering pupil personal data into AI features
- Prodeo Ltd does not require or encourage the use of pupil data with AI tools

How AI processing works

- SMID uses the **OpenAI API** (not consumer ChatGPT services)
- OpenAI acts as a **restricted sub-processor**
- Data submitted is used only to generate the requested response

- Data is **not used to train models**
- Data retention is disabled in accordance with OpenAI's enterprise controls

The output generated by the AI service is visible only to the user who requested it.

9. Who data is shared with (sub-processors)

Personal data processed in SMID may be handled by carefully selected sub-processors that provide infrastructure or technical services, including:

- Amazon Web Services (AWS) – cloud hosting and infrastructure
- Heroku (a Salesforce company) – application hosting and management
- Snowflake – secure data storage and analytics
- OpenAI – AI text processing, when user-initiated
- Wonde – secure data integration service used, where authorised by the school, to transfer data from the school's Management Information System (MIS) into SMID

All sub-processors are appointed under appropriate contractual safeguards and are permitted to process data only to provide their services to Prodeo Ltd.

A full list of sub-processors is published as part of our Trust & GDPR documentation and is available on request.

10. Where data is processed and stored

SMID is hosted using professionally managed cloud infrastructure provided by trusted third-party providers, with UK- and EU-targeted hosting as the default.

There are no routine transfers of personal data outside the UK or EU.

Where specific sub-processors may process data outside the UK or EU (for example, when optional AI features are used), this processing is:

- **limited in scope**
- **user-initiated**

- **protected by appropriate contractual safeguards in line with UK GDPR requirements**
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11. How data is kept secure

Prodeo Ltd applies technical and organisational measures designed to protect personal data, including:

- encryption in transit using TLS 1.2 or higher
- encryption at rest using provider-managed encryption
- role-based access controls
- strong authentication requirements
- audit logging of system access and activity
- regular backups and resilience measures
- restricted staff access on a need-to-know basis

Further details are available in our Information Security & Hosting Overview.

12. How long data is kept

Personal data is retained:

- for the duration of the school's contract with Prodeo Ltd
- and for a short period afterwards to allow for support, export and secure deletion

Unless otherwise agreed or required by law, data is securely deleted within **three months** of contract termination.

13. Individuals' rights

Under UK GDPR, individuals have rights including:

- the right to access their personal data
- the right to have inaccurate data corrected
- the right to request deletion in certain circumstances
- the right to restrict or object to processing in certain cases

Requests relating to pupil data should normally be made to the school, which acts as the Data Controller. Prodeo Ltd will assist schools in responding to requests where required.

14. Complaints

If you have concerns about how personal data is processed:

1. Please contact the school in the first instance, or
2. Contact Prodeo Ltd at **info@smidreport.com**

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

15. Changes to this Privacy Notice

This Privacy Notice may be updated from time to time to reflect changes in the service, legal requirements or guidance. The latest version will always be available via the SMID website.