



Privacy Notice

Clarity for Education

Version 1.3

Effective date: 11 July 2026

Current external privacy notice aligned to the reviewed public-site implementation and supplier register.



Document control	Detail
Organisation	SENDlink LTD, trading as Student Radar
Company number	16602655
Registered office	10 Masefield Gardens, Plymouth, PL5 3HU
Version	1.3
Implementation review date	11 July 2026
Effective date	11 July 2026
Status	Current external privacy notice aligned to the reviewed public-site implementation and supplier register.
Contact	dpo@studentradar.com

1. About this notice

This notice explains how SENDlink LTD, trading as Student Radar, uses personal data when you:

- visit www.studentradar.com;
- contact us, request a demo or apply to the Pathfinder programme;
- request a Sensory Profiler PDF or inclusion-funding estimate;
- use the public Echo, Sensory Profiler, Compare or school-lookup tools; or
- use the authenticated Student Radar platform through a subscribing school or trust.

It also explains the important difference between data we control directly and data we process for a school.

2. Who is responsible for your data?

The authenticated school platform

For pupil, parent/carer and school-staff information held in the authenticated platform, the subscribing school or trust is normally the **data controller**. It decides why the information is used, the lawful basis, which capabilities and MIS fields are enabled, who can access it and how long it should be kept.

SENDlink LTD is normally the school's **data processor**. We use the information on the controller's documented instructions and under the executed Data Processing Agreement. Questions or rights requests about a pupil or school record should normally be directed to the school first.

The public website and services

SENDlink LTD is the controller for information it collects for its own purposes, including:

- website enquiries and programme applications;
- public-tool inputs and requested outputs;
- technical and security data generated by public requests; and
- cookieless website measurement.



3. Information we use

Category	Examples	Source
Pupil data in the school platform	Name, date of birth or pupil identifier, year/class, attendance, assessment, SEND, provision, health and safeguarding information where the school enables and instructs those uses	The school's Wonde connection and authorised school users
Parent/carers data in the school platform	Name, contact details, relationship and communication information where a selected workflow requires it	School records and authorised users
School-staff data in the platform	Name, work email, role, school, authentication and access information, and audit events	School directory, authorised registration and use of the service
Enquiry and application data	Name, work email, school, role, phase, pupil roll, MIS, selected capabilities and optional business priorities or notes	Information you submit to a contact, demo or Pathfinder form
Sensory PDF / estimate request	Email address and optional role; for an inclusion-funding estimate, optional school, local authority and calculator totals	Information you submit to receive the requested output
Public Echo input	The bounded tapped phrase and ordered button labels or vocalisations you choose to interpret	Submitted only when you select Interpret
Public Sensory Profiler input	Generic sensory domain, pattern and behaviour catalogue selections. The generation API rejects name, school, SEND status, year group, setting, self-advocacy and free-text fields	Submitted only when you select Generate
Public Compare PDF context	Optional school name, pupil roll, setting and decision note, together with the comparison result	Submitted only when you request the PDF; not placed in the shareable URL
School-lookup query	The school name or search text you enter	Submitted only when you search the public school directory
Technical and security data	Request time, route, browser/device category, approximate country/region, referrer, security events and server logs that may include IP address	Hosting, security and browser request data
Website measurement	Page route, timestamp, referrer, device/browser category, country/region, Core Web Vitals and approved non-personal interaction identifiers	Vercel Web Analytics, Vercel Speed Insights and allowlisted marketing events

Do not submit pupil records, safeguarding details, medical information or confidential case material through public enquiry forms. Do not include names or other identifying details in Echo. The Sensory Profiler is designed to prevent pupil context and free text from entering its generation route.



4. How we collect information

School instructions and Wonde

The school can authorise a read-only Wonde connection and allow authorised staff to add or update information in Student Radar. The school controls the connection and is responsible for selecting only the fields it needs.

Public forms

We collect the fields you submit. Public lead routes apply same-origin checks, strict field and body-size limits, a honeypot and shared rate limits. Personal form values are not included in the API error logs or marketing events.

Public tools

The public AI tools make no provider request merely because you view the page. Echo calls the provider only when you select Interpret. Sensory Profiler calls the provider only when you select Generate. Compare and PDF routes run only when you request the corresponding output.

Automatic technical data

Our hosting and security providers process request metadata needed to deliver and protect the service. Server security logs may include an IP address. Public rate limiting converts the request IP into a policy-specific HMAC-SHA256 identifier before sending the short-lived counter to Upstash; the raw IP and form fields are not sent to the rate-limit store.

Production marketing pages load Vercel Web Analytics and Speed Insights. We remove query strings and URL fragments before page-view and performance data is sent. Custom marketing events use an allowlist that rejects names, emails, school names, notes, query strings and unknown properties.

5. Why we use information

Purpose	Our role	Basis or instruction
Deliver the authenticated platform	Processor	The school determines its Article 6 basis, any Article 9 condition and any DPA 2018 Schedule 1 condition. We act on its documented instructions and do not select those conditions for it.
Respond to an enquiry, arrange a demo or administer a Pathfinder application	Controller	Legitimate interests in responding to the request, taking steps towards a potential service relationship and administering the programme. Any mandatory acknowledgement in the form confirms the stated programme terms; it is not consent to unrelated marketing.
Deliver requested Sensory PDF access or an inclusion-funding estimate	Controller	Legitimate interests in delivering and supporting the output you asked for. The email is not treated as marketing consent.



Purpose	Our role	Basis or instruction
Provide public Echo interpretation and speech	Controller	Legitimate interests in providing the user-triggered service and preventing abuse. The service is not intended for identifiable health, safeguarding or criminal-offence data.
Provide public Sensory generation and PDF rendering	Controller	Legitimate interests in providing the user-triggered service and preventing abuse. The generation payload is limited to anonymous catalogue selections.
Render a Compare business-case PDF or return public school-directory results	Controller	Legitimate interests in providing the requested buyer tool. The routes do not create a persistent user profile.
Protect, troubleshoot and maintain the services	Controller for public services; processor where done for the school platform	Legitimate interests in security, availability and fault diagnosis, or the controller's documented instruction.
Measure public-site use and performance	Controller	Legitimate interests in understanding aggregated page use, approved funnel steps and performance so we can improve the site. The current measurement is cookieless and is not used for advertising.
Maintain contracts, accounting and legal records	Controller	Legal obligations and legitimate interests in administering agreements and establishing or defending legal claims.

If special category data is processed in the school platform, the school must identify both an Article 6 basis and an Article 9 condition and, where applicable, a DPA 2018 Schedule 1 condition. Student Radar does not publish a blanket statement that one school condition applies to all customers or all records.

6. Children and sensitive information

The authenticated platform is primarily used by authorised school staff and may contain information about children. The school must provide suitable privacy information to pupils and parents/carers and decide what access, if any, is appropriate for pupils.

The public Sensory Profiler does not request a name or other pupil context and its generation schema rejects context and free text. Echo does not ask for a name, but its text fields are chosen by the user. A child or supervising adult must not enter names, medical or safeguarding details, or other identifying content into Echo.

Public-tool output is advisory. The Sensory Profiler is not a diagnosis or professional assessment. Echo interpretation may not represent the user's intended meaning. A responsible person should review output before it is acted on or added to a pupil record.



7. AI processing: public tools and school-enabled capabilities

Public Echo

Echo sends the tapped phrase and ordered button labels or vocalisations to the Student Radar server. The server sends a purpose-limited prompt to the OpenAI Responses API with `store:false`, then sends the generated short utterance to the OpenAI audio speech endpoint. Generated text and audio may be held in a volatile Student Radar process-memory cache for up to 10 minutes. This route does not write the request or output to the Student Radar database.

Public Sensory Profiler

The profiler sends generic catalogue selections to the Student Radar server. The server sends a purpose-limited prompt to the OpenAI Responses API with `store:false`, validates the response and uses curated fallback content if necessary. Validated output may be cached in volatile process memory for up to 10 minutes.

The server signs the generated profile content with an HMAC-SHA256 token that expires after 10 minutes. PDF rendering accepts only the anonymous selections, unchanged generated content and valid token. Unsigned, expired, modified or client-authored profile text is rejected. PDF rendering is local to Student Radar and does not call OpenAI.

What `store:false` means

`store:false` means that Responses application-state storage is not requested for these public calls. It is not the same as Zero Data Retention. OpenAI states that default abuse-monitoring logs may contain API content and may be retained for up to 30 days unless an approved Modified Abuse Monitoring or Zero Data Retention control applies. Student Radar does not claim that its current OpenAI organisation or project has ZDR.

OpenAI states that business/API inputs and outputs are not used to train its models by default unless the organisation opts in to data sharing.

School-enabled platform AI

AI-assisted capability inside the authenticated platform is separate. It must be enabled by the school and actively invoked by an authorised user. The current capability notice and assessment must define the fields, purpose, retention, transfer position and human review before enablement.

No blanket claim is made that every platform AI input is tokenised or de-identified. A withdrawn generic feature list must not be used to approve current processing; the current capability notice controls.

8. Who receives information

The current technical register is the Student Radar Sub-Processor List, version 1.5, reviewed 11 July 2026. In summary:

Provider	Current purpose
Supabase	Core database, authentication, file storage and backups; primary project configured in eu-west-2 (London)
Vercel	Application hosting, server-side functions, static assets, edge delivery, Web Analytics and Speed Insights
Wonde	Read-only MIS integration for participating schools



Provider	Current purpose
Upstash	Short-lived HMAC-pseudonymised public-API rate-limit counters in the configured London region
Resend	Conditional transactional email
Twilio	Conditional SMS delivery
OpenAI	User-triggered public Echo and Sensory generation and, separately, an appropriately assessed school-enabled platform capability
Sentry	Conditional error and performance monitoring where configured

The fact that a provider is listed does not mean it receives every category of data. Use is determined by the context and enabled function. Contractual authorisation and objection rights for school processing are governed by the executed Data Processing Agreement, not invented by this notice.

We may also disclose information where required by law, to establish or defend legal claims, or to protect a person in an emergency, but only to the extent lawful and necessary.

9. International transfers

The primary Supabase project is configured in London. Hosting, support, delivery and optional provider processing may nevertheless involve locations outside the UK.

The public tools call the general OpenAI API domain and do not claim UK-only or EEA-only processing. Other conditional providers may also involve international processing or support access. Where restricted transfers occur, we use the applicable provider contractual safeguards, such as the UK Addendum or International Data Transfer Agreement, and assess the transfer in the relevant contract or capability review.

You can request information about the current safeguards from dpo@studentradar.com. Provider terms and locations can change, so the dated Sub-Processor List is the controlling technical register for procurement purposes.

10. Retention

The full current position is in the Student Radar Data Retention and Deletion Schedule. Key periods are:

- live Customer Data: subscription term plus up to 30 days after termination, unless the controller gives a different documented instruction or a legal hold applies;
- backups containing Customer Data: up to 90 days to age out after termination;
- public Echo and Sensory generated server cache: up to 10 minutes in volatile process memory;
- Sensory PDF signature: 10 minutes;
- OpenAI public-tool abuse-monitoring logs: up to 30 days by default, notwithstanding `store:false`;
- Upstash rate-limit keys: a little over two minutes after the one-minute policy window;
- Web Analytics visitor identifier: reset after 24 hours; aggregate retention follows the current Vercel plan and account controls; and
- inactive public enquiries: reviewed under the enquiry schedule and not retained indefinitely by default.

Browser storage used by Echo and the Sensory Profiler is described in the Cookie, Client Storage and Telemetry Notice. You can clear it through the relevant tool or browser settings.



11. Your rights

Depending on the processing and lawful basis, you may have rights to:

- be informed about the use of your personal data;
- obtain a copy of it;
- correct inaccurate or incomplete information;
- request erasure in applicable circumstances;
- restrict processing in applicable circumstances;
- object to processing based on legitimate interests or public task;
- receive certain information in a portable form where the legal conditions apply; and
- complain to the Information Commissioner's Office.

These rights are not absolute and do not all apply to every activity.

For pupil or school records in the authenticated platform, contact the school or trust first. It is the controller and will decide the response. Student Radar will assist it as required by the Data Processing Agreement.

For a website enquiry, public-tool request or other information SENDlink LTD controls directly, contact dpo@studentradar.com. We may need proportionate information to verify identity. We will respond without undue delay and ordinarily within one month, subject to the lawful extensions and exemptions that may apply.

12. Automated decision-making and profiling

The public Echo and Sensory tools return advisory output in response to a user action. They do not create a persistent Student Radar pupil profile or make a decision that produces legal or similarly significant effects.

For the authenticated platform, the controller must assess the actual enabled capability. Student Radar does not authorise a school to rely on an obsolete generic feature description. Where a capability involves profiling or prioritisation, the school must explain the purpose, inputs, logic at a meaningful level, consequences, human review and route to correct or challenge the result.

13. Cookies, client storage and telemetry

The current public marketing site does not load advertising pixels or set non-essential analytics cookies. Vercel Web Analytics and Speed Insights provide cookieless, aggregated measurement. Web Analytics identifies a visitor through a request-derived hash that resets after 24 hours; Speed Insights reports anonymous performance data.

Public tools use browser storage for requested functionality. Sensory Profiler uses session storage for anonymous selections and a boolean PDF-access marker. Echo uses local storage, session storage, IndexedDB, Cache Storage and a service worker for preferences, board data, navigation and offline operation. See the separate Cookie, Client Storage and Telemetry Notice for the current inventory and clearing instructions.

We do not show a cookie-consent banner on the current production marketing site because the measurement described above is cookieless and the public-tool storage is used for requested functionality or preferences. If a consent-requiring tracker or new purpose is introduced, it must not be enabled until the notice and consent control have been updated.



14. Security

We apply measures appropriate to the service and data. The current published platform control set includes encryption in transit and at rest, role-based access control, database row-level security and multi-factor authentication for staff accounts. Public routes add same-origin checks, strict validation, body-size limits and rate limiting. The Sensory PDF boundary adds a short-lived content signature.

We maintain incident-response procedures. If a personal-data breach affects Customer Data, we will inform the controller without undue delay and provide available information to support its assessment. The controller decides whether it must notify the ICO or affected people.

This notice does not extend a control claim beyond the scope supported by current evidence and makes no universal tokenisation or provider-retention promise.

15. Complaints and contact

Contact the Student Radar Data Protection Lead:

SENDlink LTD (Student Radar) 10 Masefield Gardens Plymouth PL5 3HU Email: dpo@studentradar.com
Website: www.studentradar.com

If your concern relates to school-controlled data, you may also contact the school's DPO or Data Protection Lead.

You can complain to the Information Commissioner's Office:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Telephone: 0303 123 1113 Website: ico.org.uk

16. Changes to this notice

We will update the version and effective date when this notice changes. Where a change materially affects school-controlled processing, we will communicate it through the contractual or service channel appropriate to the change. A privacy notice is not a contract, and continued use is not described as consent to new processing.

17. Related documents and sources

- Student Radar Sub-Processor List, version 1.5, reviewed 11 July 2026
- Student Radar AI Processing and Transfer Overview, version 1.4, reviewed 11 July 2026
- Student Radar Data Retention and Deletion Schedule
- Student Radar Cookie, Client Storage and Telemetry Notice
- Student Radar Appropriate Policy Document - Supplier Statement
- Student Radar Data Protection Impact Assessment - Supplier Information and School Template
- Executed Customer Data Processing Agreement
- ICO, [What privacy information should we provide?](#)
- Vercel, [Web Analytics privacy and compliance](#)
- Vercel, [Speed Insights privacy and compliance](#)
- OpenAI, [API data controls and endpoint retention](#)
- OpenAI, [How business data is used](#)



18. Version history

Version	Date	Change
1.0	21 February 2026	Withdrawn downloadable copy. It described obsolete analytics cookies, AI capabilities, blanket tokenisation/ZDR and unsupported controls.
1.2	10 July 2026	Live public page aligned to the initial remediation and public Sensory boundary.
1.3	11 July 2026	Rewritten as a downloadable, role-specific notice; corrected public Echo/Sensory processing, cookieless telemetry, provider retention, browser storage and school-enabled capability review.