



askKira.com

DATA PROTECTION AND PROCESSING Q&A

AUTUMN TERM 2025

Is askKira a data processor or controller?

askKira acts as a data processor. Your school or trust is the data controller because you decide what information is entered into the system. We only process data on your instructions, in line with UK GDPR.

What lawful basis do you use for processing?

- Contract: to deliver the service you have subscribed to.
- Legitimate interests: for optional anonymised analytics and insights (where opted-in). We do not rely on consent as the main lawful basis for school use, in line with DfE guidance.

How is personal data, including children's data, handled and protected?

- Data is processed in real time to generate a response.
- Only stored when required for features such as saved conversations, profiles, or organisational insights.
- Hosted securely on Amazon Web Services (AWS) London (eu-west-2 region).
- Encryption in transit and at rest.
- User access controlled via authentication and role-based permissions.
- No user content shared with third parties or used to train language models.
- No staff at askKira monitor conversations. In the rare case of access for troubleshooting, this is done only by authorised staff with an enhanced DBS check.

Is user data anonymised?

Yes. Interactions are linked only to a unique user ID. Where data is aggregated for insights, all personal identifiers are stripped out.

Does askKira sell or share data with third parties?

No. We do not sell, share, or transfer user-submitted data.

- Our sub-processors (AWS, Azure, OpenAI, Google, etc.) only provide infrastructure.
- None of your input is used to train their models.
- Schools will be notified of any new sub-processors within 4 weeks, and all are bound by UK GDPR.



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SPRING TERM 2, 2025

Does any data leave the UK?

Our primary hosting is in the UK (AWS London). In rare cases, limited processing may take place in the EEA or USA under the UK–US Data Bridge and Standard Contractual Clauses (SCCs), ensuring legal safeguards are in place.

How long is data kept?

- Data is retained only as long as required.
- Chat history remains while accounts are active, unless deleted.
- We can configure automatic deletion to match your retention policy (e.g. 6 or 12 months).
- On contract end, all personal data is securely deleted within a defined timeframe; backup systems are purged on rotation.

Who owns the intellectual property (IP) in pupil work?

The pupil or school retains full ownership. Submitting text to askKira does not transfer any IP rights.

Can users delete their data?

Yes.

- Individual users can delete their chat history.
- Administrators can request organisation-wide deletion.
- Deletions are permanent.

Can we set an automatic deletion policy?

Yes. We can configure this to match your trust's records management policy.

Who can access user content?

No one at askKira routinely accesses user content. Exceptional access (e.g. technical investigation) is restricted to authorised, DBS-checked staff.

Will we be provided with a Data Processing Agreement (DPA)?

Yes. A formal DPA is included with your contract, in compliance with UK GDPR.



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Why does askKira display “Do not share sensitive/personal data. Not intended for regulatory compliance.”?

This is a cautionary reminder. As with emails or CPOMS notes, staff should avoid entering full names or identifiable details unless necessary. This ensures GDPR and safeguarding compliance.

How reliable is the service?

- Hosted on AWS London with 99.99% uptime guarantee.
- Our performance consistently exceeds this.
- Contract includes an SLA with right to termination for repeated/prolonged downtime.

Does askKira support internal learning?

Yes:

- Personal level - individual users can save chats and style preferences for consistent responses.
- Trust level - for whole-organisation subscriptions, we can ingest policies, procedures, and values to ensure responses are aligned with your trust's approach.

How often is askKira updated?

Quarterly. All updates are reviewed for compliance, security, and safeguarding before rollout.

Who can use askKira?

All staff, not just teachers. Profiles include “Teacher”, “Support staff”, “Leadership”, “Other”, and “Non-teaching staff”.

What rights do staff have under UK GDPR?

- Access their data
- Correct inaccuracies
- Request deletion (“right to be forgotten”)
- Request data portability
- Object to processing (where applicable)

Requests can be made via your trust or to our Data Protection Officer: info@askkira.com.

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How are data breaches handled?

In line with UK GDPR and ICO guidance:

- Investigate and contain immediately
- Notify the ICO within 72 hours if there is a risk to individuals
- Inform affected schools/individuals
- Document and review to prevent recurrence

Safeguarding and legal disclosures

If any safeguarding issue arises (e.g. evidence of risk to a child or adult), we comply with our legal duty to report and relevant UK safeguarding frameworks.

Cyber security standards

We are Cyber Essentials certified, conduct regular security audits, and follow UK GDPR requirements for data security, including encryption, penetration testing, and staff training.

Insurance and liability cover

We maintain robust insurance cover to protect clients and users:

- Public Liability: £2,000,000
- Professional Indemnity & Products Liability: £2,000,000
- Employers' Liability: £10,000,000

Cookies and tracking

Our website/app uses analytics tools (Google Analytics, Hotjar, X) to improve services.

- No advertising cookies are used.
- Staff can opt out or manage cookies through browser settings.

Accessibility and inclusion

askKira is designed with digital equity in mind:

- Compatible with accessibility tools (screen readers, WCAG compliant).
- Inclusive onboarding for all staff, regardless of digital confidence.
- Additional support available for less digitally confident colleagues.



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Does askKira comply with DfE and Ofsted guidance?

Yes. askKira aligns with:

- DfE guidance on AI - safe, transparent, ethical use in schools.
- Ofsted AI study findings - importance of AI champions, safeguarding, compliance, and effective staff training.
- UK GDPR & Data Protection Act 2018.