



Last updated: 28th September 2025

STAR21 ("we", "us", or "our") is committed to protecting the privacy of our users, including teachers, school staff, and other professionals who interact with our AI-powered coaching platform. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our services.

1. Information We Collect

We collect the following types of personal data:

- **Audio recordings** of lessons or coaching sessions uploaded by users.
- **Transcripts** generated from those recordings.
- **User account information**, including name, email address, school or institution, and professional role.
- **Usage data**, including access logs, session duration, and user interactions with the platform.
- **Feedback or coaching preferences**, if provided.

2. How We Use Your Information

We use the collected information for the following purposes:

- To generate transcripts and coaching reports.
- To provide insights for professional development and reflection.
- To send reports and feedback via email.
- To improve our platform through aggregated, anonymised usage analytics.
- To comply with legal obligations or respond to lawful requests.

3. Legal Basis for Processing

For lesson recordings and related data:

- Schools are the Data Controllers. They rely on the lawful basis of Public Task under UK GDPR, because recording and analysing lessons is necessary to support their official function of delivering education and improving teaching quality.
- STAR21 acts as the Data Processor on behalf of schools for this purpose, processing lesson audio and transcripts only under the school's instructions.

For anonymised and aggregated data:

- STAR21 acts as an independent Data Controller when creating and using anonymised or aggregated datasets that cannot identify individuals or schools.
- The lawful basis for this processing is Legitimate Interests (Article 6(1)(f) UK GDPR), specifically to improve our services, carry out educational research, and generate insights that support the wider teaching profession.
- STAR21 will never attempt to re-identify individuals, and no outputs will identify a specific teacher, student, or school without explicit prior consent.

For other interactions (e.g. user accounts, billing, and communications):

- Where STAR21 contracts directly with a school, processing is based on Contract (Article 6(1)(b)).
- Where required to comply with legal obligations (e.g. safeguarding disclosures), STAR21 will process data under Legal Obligation (Article 6(1)(c)).

We do not rely on Consent for lesson recordings, as schools are public authorities acting under Public Task. However, teachers, students, and parents remain fully informed, and opt-out routes are available where appropriate.

4. Sharing and Disclosure

We may share data with:

- **Service providers** who support our platform (e.g. transcription and AI analytics services).
- **School administrators or MAT leaders**, with your consent or as part of a school-wide implementation.
- **Regulatory bodies** or authorities, when legally required.
- **Trusted partners**, in the form of **aggregated and anonymised data**, for purposes such as educational research, product improvement, or commercial insights.

All third parties are contractually obligated to handle data securely and only for the purpose intended.

5. Data Retention

- Audio files and transcripts are stored securely.
- Files are encrypted, access-controlled, and can be deleted by the teacher at any time.
- Upon termination or expiry of the Agreement, STAR21 will delete or (at the Customer's option) return all Customer Personal Data, and delete existing copies within ninety (90) days, unless Data Protection Laws require longer storage.
- Where required for safeguarding, legal obligations, or regulatory requests, recordings may be preserved securely under legal hold until the matter is resolved.
- Aggregated and anonymised data (which cannot identify individuals or schools) may be retained indefinitely for statistical, research, or service-improvement purposes.

6. Your Rights

Under UK GDPR and applicable laws, you have the right to:

- Access your personal data.
- Rectify inaccuracies.
- Request deletion (right to be forgotten).
- Object to or restrict processing.
- Lodge a complaint with the Information Commissioner's Office (ICO).

To exercise these rights, contact us: contact@star21.ai

7. Data Security

We implement appropriate technical and organisational measures to protect your data, including:

- End-to-end encryption of audio uploads.
- Secure cloud storage with access controls.
- Role-based access for authorised personnel only.
- Regular security audits and compliance checks.

8. International Data Transfers

If data is processed outside the UK, we ensure that appropriate safeguards are in place, such as Standard Contractual Clauses or UK adequacy decisions.

9. Updates to this Policy

We may update this policy to reflect changes in technology, legal requirements, or our practices. We encourage you to review it regularly.

Contact Us

If you have questions about this Privacy Policy or our data practices, please contact:

STAR21 Data Protection Officer

Email: info@starlightmentor.com