# EXAMHERO PRIVACY POLICY

**ExamHero.ie**

**Last Updated:** 4 Nov 2026
**Effective Date:** 1 Sept 2026

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## 1. WHO WE ARE

**Data Controller:** ExamHero.ie
**Legal Entity:** 822511, EXAMHERO LIMITED
**Registered Address:** 57 Cherbury Park Road, Lucan, Dublin, K78 V3W, Ireland
**Contact Email for Privacy Matters:** hello@examhero.ie

We are committed to protecting your privacy and ensuring you understand how we collect, use, and protect your personal data. This Privacy Policy explains our practices in clear, straightforward language.

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## 2. WHAT THIS POLICY COVERS

This Privacy Policy applies to:

- **Students** aged 12 and over who use our AI tutoring platform
- **Parents/Guardians** who create accounts to monitor their child's learning
- **Teachers and School Principals** who may access school-level dashboards

If you are under 16, your parent or guardian must give consent on your behalf before you use our platform (see Section 5.2).

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## 3. OUR ROLE AS DATA CONTROLLER

We are a **Data Controller** under the General Data Protection Regulation (GDPR) and the Irish Data Protection Act 2018. This means:

- We decide what personal data we collect
- We decide how we use that data
- We are responsible for protecting your data
- You have rights over your data (see Section 10)

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# 4. WHAT PERSONAL DATA WE COLLECT

## 4.1 Data We Collect from Students

When you create a student account on ExamHero.ie, we collect the following. Your name, email, school year and selected exams are necessary to create an account and use the service; without them we cannot provide the tutor. Other items are optional or are generated through your use of the service:

- First name
- Last name
- Email address
- School name
- School year/grade
- Selected exams (e.g., Maths, Irish, History, etc.)
- Learning preferences and interests
- AI tutor chat history and interactions, plus technical data such as IP address, device and browser information, and usage logs. Chats may contain anything you type, so please avoid sharing sensitive personal information

## 4.2 Data We Collect from Parents/Guardians

When you create a parent account, we collect:

- First name
- Last name
- Email address

Your parent account is required to link with your child's student account. This enables you to monitor your child's learning progress.

### 4.3 Data We Collect from Teachers and School Principals

When you create a teacher or principal account, we collect:

- First name
- Last name
- Email address
- School name
- Subject taught (for teachers)

### 4.4 Authentication Data

All users (students, parents, teachers) authenticate through **Auth0** (provided by Okta). Auth0 securely manages your login credentials (username and password). We do not store your password directly—Auth0 handles this securely.

### 4.5 Payment Data

Payment information is processed entirely by **Stripe**, our payment processor. We do not store or see your full credit card details. Stripe collects:

- Card holder name
- Billing address
- Payment amount
- Transaction history

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## 5. WHY WE COLLECT THIS DATA (OUR LEGAL BASIS)

We collect and process your data under the following legal bases:

### 5.1 Contract Performance

For students aged 16 and over, and for parent, teacher and principal accounts, we process your data because it is necessary to provide our service (performance of a contract):

- Storing your student profile enables you to access the AI tutor
- Storing your learning preferences personalizes your study experience
- Storing your chat history allows you to review past tutor interactions

- Parent/teacher accounts enable account monitoring

### 5.2 Parental Consent (for Students Under 16)

For students under 16 (the age of digital consent in Ireland), we rely on the consent of a parent or guardian as our legal basis. This consent is given through a separate, clear consent step when the parent creates or links their account; simply accepting this Privacy Policy is not consent. We take reasonable steps to verify that the person giving consent is the child's parent or guardian through the sign up process. A parent can withdraw consent at any time and we will then stop processing the child's data.

### 5.3 Legitimate Interest

We may process data for our legitimate business interests (always balancing your privacy):

- Improving the accuracy and helpfulness of our service, using only aggregated or de-identified data and never by training AI models on your chat content (see Section 7)
- Analyzing platform usage to enhance features (where this uses analytics cookies, we do so only with your consent: see Section 13)
- Preventing fraud and abuse
- Note: legal obligations (such as keeping tax records) are a separate legal basis, and where we rely on legitimate interest we document a balancing test that gives particular weight to children's rights

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## 6. HOW WE USE YOUR DATA

### 6.1 Providing Our Service

- **Students:** We use your data to provide AI tutoring, track your study sessions, generate personalized recommendations, and maintain your chat history
- **Parents:** We use your data to send account alerts and progress updates
- **Teachers/Principals:** We use your data to enable access to school-level dashboards showing anonymized, aggregated data

### 6.2 AI Tutor & Performance Analysis

Our AI tutor analyzes your conversations and study patterns to:

- Identify areas where you need more help
- Recommend study topics and resources
- Personalize learning suggestions
- Improve your study plan

**Important:** This analysis is used only to improve YOUR learning experience. Your individual analysis is not shared with other students.

## 6.3 Analytics & Platform Improvement

If you accept analytics cookies, we use Google Analytics to understand how our platform is used:

- How many students access different features
- Which study topics are most popular
- Technical issues or performance problems

Google Analytics uses cookies and online identifiers, so we treat this data as pseudonymous personal data. We only collect it if you accept analytics cookies, and we configure Google Analytics to minimise the data collected.

## 6.4 School Dashboards (Aggregated Data)

For schools, we provide **anonymized, aggregated dashboards** showing:

- Number of active students
- Popular study topics
- Overall exam pass rates
- Platform usage statistics

This data does NOT identify individual students and cannot be used to track individual learning.

## 6.5 What We Do NOT Do

- We do NOT use your chat data to train or fine-tune any AI model
- We do NOT share your individual student data with other students
- We do NOT sell your data to third parties
- We do NOT use your data for marketing purposes (except feature updates to users who opt-in)

- We analyse your study patterns to personalise your learning (this is a form of profiling), but we do NOT use it to make automated decisions that have legal or similarly significant effects on you, to discriminate, or for marketing

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# 7. AI PROCESSING & AUTOMATED DECISION-MAKING

## 7.1 How Our AI Tutor Works

Your AI tutor analyzes your conversations and study patterns using machine learning. This means:

- The AI uses your questions and answers within your own account to tailor its responses to you (it does not learn from them to improve models for other users)
- The AI identifies your weak areas
- The AI makes recommendations to improve your study plan

**This is NOT automated decision-making in the legal sense** (e.g., we're not automatically failing you or denying access). The AI provides suggestions that you decide whether to follow. Analysing your study patterns to personalise recommendations is a form of profiling under GDPR (Article 4(4)). We use it only to tailor your own learning experience, and it does not produce legal or similarly significant effects.

## 7.2 Transparency About AI

- You always know when you're chatting with an AI tutor (not a human)
- You can request an explanation of why the AI recommended something
- All AI recommendations are suggestions—you have final control

## 7.3 No Training on Individual Data

**We do NOT use student chat data to train or improve our AI models.** Your conversations with our AI tutor are used only to:

- Provide tutoring to you in real-time
- Store your chat history so you can review past sessions
- Analyze your learning patterns to improve recommendations for YOU

Your chat data is:

- NOT used to train or fine-tune any AI model
- NOT shared with third-party AI vendors for training
- NOT used for any purpose beyond your personal learning experience
- Deleted when you delete your account (see Section 9 for how deletion works)

**If this changes in the future:**
We will only use your data to train our AI if:

- We obtain your explicit, separate consent
- We anonymize or pseudonymize your chat data
- You have the right to opt-out
- We update this Privacy Policy

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# 8. WHO WE SHARE YOUR DATA WITH

## 8.1 Third-Party Service Providers (Data Processors)

We share your data with the following companies who process it on our behalf. In addition to those listed below: Amazon Web Services (hosting, EU region); OpenAI that processes tutor chats; and Google Suite. Stripe acts as an independent controller for some of its own processing (for example fraud prevention and legal compliance); please see Stripe's privacy policy.

**Auth0 (by Okta)**

- Purpose: Secure authentication and login management
- Data Shared: Email, username, password (encrypted)
- DPA in Place: Yes ✓
- Location: EU and US

**Stripe**

- Purpose: Payment processing
- Data Shared: Name, billing address, payment amount
- DPA in Place: Yes ✓
- Note: Card details are entered directly with Stripe and tokenised. Stripe acts as our processor for payments and as an independent controller for its own fraud-prevention and regulatory obligations

**Google Analytics**

- Purpose: Usage analytics (only with your consent)
- Data Shared: Online identifiers and browsing behavior, only if you accept analytics cookies
- DPA in Place: Yes ✓

## 8.2 Data Shared with Your Parent/School

**If You Are a Student:**

- Your parent/guardian can see your study sessions and performance analysis through their linked account and, if you are under 16, your AI tutor chat history (see Section 11.2)
- Your **teacher/principal** can see anonymized, aggregated school-level data only—NOT your individual chats or data

## 8.3 Who Does NOT See Your Data

- Other students cannot see your data
- Individual teachers cannot see individual student data (only school aggregates)
- Marketing partners or advertisers cannot see your data
- Other third parties cannot see your data, except our service providers (Section 8.1) and where legally required

## 8.4 Data Processing Agreements

We have signed Data Processing Agreements (DPAs) with Auth0, Stripe, Google Analytics, and each of our other processors, including AWS and our OpenAI. These agreements ensure they:

- Only process data as we instruct
- Implement appropriate security measures
- Do not use your data for their own purposes
- Assist with your data rights requests

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# 9. HOW LONG WE KEEP YOUR DATA

### 9.1 Chat History & Interactions

- **While Active:** We store your AI tutor chat history while your account is active
- **After Deletion:** We delete all chat data from our live systems within 30 days of you deleting your account. If an account has been inactive for 6 months we will email you and, if there is no response, we will delete it.

### 9.2 Student Profile Data

- **While Active:** We retain your profile (name, school, exams, preferences) while your account is active
- **After Deletion:** We delete your profile data from our live systems within 30 days of account deletion
- **Exception:** We may retain anonymized data for analytics (you cannot be identified)

### 9.3 Parent & Teacher Data

- Same as student profile data: deleted within 30 days of account deletion

### 9.4 Payment & Billing Records

- We retain payment records for **6 years** for tax and legal compliance (not by choice—required by Irish tax law)
- Stripe also retains records according to their retention policy

### 9.5 Backup Data

- We maintain backups of all data within the EU (same servers, same region)
- Backups are overwritten on a rolling cycle of no more than 90 days, after which deleted data no longer exists in backups. Until then, backed-up data is kept securely and is not used for any other purpose

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## 10. YOUR RIGHTS UNDER GDPR

You have the following rights regarding your personal data:

### 10.1 Right to Access

You can request a copy of all personal data we hold about you.
**How:** Email hello@examhero.ie with "Data Access Request"
**Timeline: We will respond within one month**

## 10.2 Right to Rectification

You can correct any inaccurate data we hold about you.
**Example:** If your school name is spelled wrong, we'll correct it
**How:** Log into your account or email hello@examhero.ie

## 10.3 Right to Erasure ("Right to be Forgotten")

You can request deletion of your data (subject to some exceptions).
**Exceptions:** We may need to keep data for tax purposes or legal obligations
**How:** Email hello@examhero.ie with "Deletion Request"
**Timeline:** We will delete your data without undue delay and within one month (backups are overwritten as described in Section 9.5)

## 10.4 Right to Data Portability

You can request your data in a portable format (e.g., CSV) to move to another service.
**How:** Email hello@examhero.ie with "Portability Request"
**Timeline: one month**

## 10.5 Right to Object

You can object to certain processing activities (e.g., analytics, recommendations).
**How:** Email hello@examhero.ie specifying what you object to
**Timeline:** We will stop the processing unless we can demonstrate compelling legitimate grounds that override your interests. You can always object to direct marketing and we will stop immediately. We will respond within one month

## 10.6 Right to Restrict Processing

You can ask us to limit how we use your data.
**Example:** "Process my data only for tutoring, not for analytics"
**How:** Email hello@examhero.ie

## 10.7 Rights Related to Automated Decision-Making

You have the right to request human review of any automated decisions.
**How:** Email hello@examhero.ie if you believe an AI recommendation unfairly affected you

### 10.8 How to Exercise Your Rights

**Contact:** hello@examhero.ie
**Include in Your Request:**

- Your name and email
- Which right you're exercising
- Specific details (which data, etc.)
- Any information we reasonably need to verify your identity (we will not ask for more than necessary)

We will confirm receipt and process your request free of charge within one month (extendable by up to two further months for complex or numerous requests, in which case we will tell you why). You can also withdraw any consent you have given at any time, as easily as you gave it, without affecting processing carried out before withdrawal.

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## 11. PARENTAL RIGHTS (FOR PARENTS OF UNDER-16s)

If your child is under 16, you have additional rights:

### 11.1 Parental Consent

You must create a parent account and give your consent (as a separate step) before your child can use ExamHero.ie. Your child's account is linked to your parent account.

### 11.2 Monitoring Your Child's Data

For students under 16, you can log into your parent account to:

- View your child's AI tutor chat history
- See study progress and recommendations
- Review learning preferences and selected exams
- Monitor platform activity

### 11.3 Exercising Rights on Your Child's Behalf

You can make data requests (access, deletion, portability) on behalf of your child.
**How:** Email hello@examhero.ie with "Parental Request on Behalf of [Child's Name]"

### 11.4 Withdrawal of Consent

You can withdraw consent at any time by:

1. Deleting your parent account (which disables your child's account)
2. Emailing hello@examhero.ie with "Consent Withdrawal"

If you withdraw consent, we will stop processing your child's data immediately and delete it within 30 days (backups as described in Section 9.5).

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## 12. DATA SECURITY

We take data security seriously. Here's how we protect your data:

### 12.1 Encryption

- All data in transit (moving between your device and our servers) is encrypted using HTTPS
- Sensitive data at rest (stored on our servers) is encrypted
- Passwords are never stored in plain text

### 12.2 Server Security

- Data is hosted on **AWS servers in the EU**
- AWS maintains industry-leading security certifications (ISO 27001, SOC 2)
- We regularly update and patch our systems
- Access is restricted to authorized personnel only

### 12.3 Access Controls

- Only authorized team members (support staff) can access user data
- Access is limited to what's needed to provide support
- All access is logged and monitored

### 12.4 Data Backups

- We maintain regular backups within the EU region
- Backups are encrypted and stored securely
- Backups enable us to recover data if something goes wrong

### 12.5 What We Cannot Guarantee

- No system is 100% secure
- If a security breach occurs, we will notify the Data Protection Commission within 72 hours where required, and notify affected users without undue delay where the breach is likely to result in a high risk to them
- We maintain cyber insurance and incident response procedures

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## 13. COOKIES & TRACKING

### 13.1 What Are Cookies?

Cookies are small text files stored on your device that help websites remember you and track your activity.

### 13.2 How We Use Cookies

We use cookies for:

- **Necessary Cookies:** Login and session management (required for the platform to work)
- **Analytics Cookies:** Google Analytics to understand platform usage. These are only set if you accept them through our cookie banner, and you can change your choice at any time

### 13.3 Marketing & Advertising Cookies

- We do NOT use cookies for marketing or advertising purposes
- We do NOT track you across other websites

### 13.4 Managing Cookies

You can control cookies in your browser settings:

- Allow all cookies
- Block all cookies
- Block only tracking cookies

**Note:** If you block necessary cookies, you may not be able to log in.

### 13.5 Do Not Track

Analytics cookies are controlled by your cookie banner choices (see Section 13.2), not by browser "Do Not Track" signals, which are not a recognised consent mechanism.

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## 14. MARKETING COMMUNICATIONS

### 14.1 Feature Updates & Platform News

We may send you **occasional emails about:**

- New features on ExamHero.ie
- Platform updates relevant to your exams
- Service announcements (e.g., maintenance)

### 14.2 Opting In/Out

- Marketing emails are opt-in only, and are not sent to students under 16 without parental consent via our sign up process.. Service announcements (e.g. maintenance) are not marketing and are sent as needed. You can opt out of marketing at any time
- **How:** Click "Unsubscribe" in any email we send
- Or email hello@examhero.ie with "Unsubscribe"

### 14.3 What We Will NOT Send

- Marketing emails from third parties
- Promotional content unrelated to your studies
- Unsolicited newsletters

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# 15. INTERNATIONAL DATA TRANSFERS

## 15.1 Where Your Data Is Processed

- **Primary Storage:** AWS servers in the EU (Ireland, Frankfurt, or Paris region)
- **Authentication:** Auth0 may process data in the EU or US
- **Payment/Other:** Stripe may process data in the EU or US. Analytics: Google may process data in the US. OpenAI processing in the EU or US

## 15.2 Legal Framework for International Transfers

When data is transferred outside the EU:

- We rely on **Standard Contractual Clauses (SCCs)** approved by EU regulators
- Where a provider is certified under the EU-US Data Privacy Framework we may rely on that; otherwise we rely on SCCs together with a transfer risk assessment
- We have **Data Processing Agreements** in place

## 15.3 Your Rights for International Transfers

You have the right to know about international transfers:

- Ask us which companies process your data outside the EU
- Request details about safeguards in place
- Contact hello@examhero.ie with questions

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# 16. SCHOOL DASHBOARDS & AGGREGATED DATA

## 16.1 What Are School Dashboards?

We offer optional dashboards for schools showing:

- Number of active students using ExamHero.ie
- Popular study topics
- Exam performance trends (anonymized)
- Overall platform engagement metrics

## 16.2 Anonymization & Aggregation

- Data is **anonymized** (individual students cannot be identified)
- Data is aggregated (combined from multiple students, with a minimum group size of 5 before any figure is shown)
- Individual student names, chats, or grades are NEVER shown

### 16.3 School Privacy

- Teachers and principals can ONLY see school-level dashboards
- They cannot see individual student data
- Individual student data remains private to the student and their parent

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## 17. CHILDREN'S PRIVACY & SPECIAL PROTECTIONS

### 17.1 Age Requirements

- Minimum age to use ExamHero.ie: **12 years old**
- Students aged 12-15 require parental consent
- Students aged 16+ can consent themselves

### 17.2 Parental Involvement

- For under-16 students, a parent/guardian must create an account
- The parent account is linked to the student account
- Parents have visibility into their child's learning data
- Parents must give separate, verified consent for their child's data to be processed

### 17.3 Data Minimization for Children

- We only collect data necessary for tutoring (not excessive personal information)
- We do not use children's data for commercial profiling
- We do not share children's data with third-party advertisers

### 17.4 Safety & Monitoring

- Our support team can access student data to resolve issues
- We monitor for abuse or misuse of the platform
- If we detect activity that raises a serious safety or safeguarding concern through the AI tutor chat functionality, we may contact a parent or guardian directly.

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# 18. LEGAL OBLIGATIONS & LAW ENFORCEMENT

## 18.1 When We May Disclose Data

We may disclose your data if required by law:

- Court orders or legal process
- Investigation of fraud or abuse
- Protection of rights, privacy, or safety
- Compliance with Irish or EU regulations

## 18.2 Your Rights

- If we receive a legal request, we will inform you where we are able to and it is lawful to do so
- You have the right to challenge unlawful requests
- We will disclose only the minimum data legally required

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# 19. DATA BREACH NOTIFICATION

## 19.1 Our Commitment

If a security breach exposes your personal data, we will:

- Investigate immediately
- Notify the Data Protection Commission within 72 hours of becoming aware of the breach (where required) and notify you without undue delay if there is a high risk to you
- Cooperate with the Data Protection Commission (Ireland's regulator)

## 19.2 What the Notification Will Include

- Description of the breach
- Data affected
- Likely consequences

- Measures we're taking to address it
- Our contact information

### 19.3 Your Rights After a Breach

- Right to support and information
- Right to make a complaint to the Data Protection Commission
- Potential compensation for damages (if applicable)

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## 20. RETENTION & DELETION POLICY

| Data Type | Retention Period | Deletion Trigger |
|---|---|---|
| Student Chat History | Until account deletion; then deleted within 30 days | Account deleted, or inactive for 6 months |
| Student Profile | Until account deletion; then deleted within 30 days | Account deleted, or inactive for 6 months |
| Parent/Teacher Profile | Until account deletion; then deleted within 30 days | Account deleted, or inactive for 6 months |
| Payment Records | 6 years | Required for tax compliance |
| Backup Data | Rolling backup cycle of 90 days | Overwritten on backup cycle |
| Anonymized Analytics | Indefinite | Never (cannot identify you) |

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## 21. CONTACT & COMPLAINTS

### 21.1 Questions About This Policy

If you have questions about how we handle your data:
**Email:** hello@examhero.ie

We will respond within 10 business days.

### 21.2 Data Protection Officer

We keep under review whether we are required to appoint a Data Protection Officer (DPO), and will publish their contact details here if we do. In the meantime, privacy questions can be sent to the contact above. Because we process children's data using AI, we carry out a Data Protection Impact Assessment (DPIA) and review it regularly.

### 21.3 Complaints & Regulatory Authority

If you are unhappy with how we handle your data, you have the right to lodge a complaint with:

**Data Protection Commission (Ireland)**

- Website: www.dataprotection.ie
- Email: info@dataprotection.ie
- Phone: (01) 765 01 00 or 1800 437 737
- Address: 6 Pembroke Row, Dublin 2, D02 X963, Ireland

**Important:** You can complain to the Data Protection Commission at any time, free of charge. You do not need to exhaust our complaint process first.

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## 22. CHANGES TO THIS PRIVACY POLICY

### 22.1 When We Update This Policy

We may update this Privacy Policy if:

- We change how we process your data
- New legal requirements emerge
- We improve our privacy practices

### 22.2 How We Notify You

- Major changes will be communicated by email
- We will update the "Last Updated" date on this policy
- Where a change needs your consent, we will ask for it again

### 22.3 Your Acceptance

This Privacy Policy explains how we use your data; it is not a request for your consent, except where we ask for consent separately (for example parental consent or analytics cookies). If you disagree with it, you can delete your account.

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## 23. SUMMARY FOR STUDENTS & PARENTS

**In Simple Terms:**

✅ **We Collect:**

- Your name, school, exams, and learning interests
- Your AI tutor chat conversations
- Your study activity and progress

✅ **We Do:**

- Use your data to teach you (AI tutor)
- Analyze your learning to give better recommendations
- Keep your data safe and encrypted
- Show parents/guardians a summary of learning progress
- Delete your data within 30 days of you deleting your account

❌ **We Don't:**

- Sell your data to anyone
- Share your chats with other students
- Use your data for ads or marketing
- Use your chat data to train or fine-tune AI models
- Keep your data longer than necessary

✅ **Your Rights:**

- See all the data we hold about you

- Ask us to fix or delete your data
- Ask us to stop using your data
- Complain to the government (Data Protection Commission)

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## 24. DEFINITIONS

**Data Controller:** The person/organization that decides what data to collect and how to use it (that's us—ExamHero.ie)

**Data Processor:** A company that processes data on behalf of the controller (e.g., Auth0, Stripe)

**Personal Data:** Any information that identifies you (name, email, etc.)

**Processing:** Any action on personal data (collecting, storing, analyzing, sharing, deleting)

**GDPR:** General Data Protection Regulation—EU law protecting privacy

**DPA:** Data Processing Agreement—legal contract ensuring proper data handling

**Anonymized Data:** Data that cannot identify any individual (we can't reverse it to identify you)

**Breach:** Unauthorized access to or loss of personal data

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*This Privacy Policy was created in compliance with GDPR (EU) 2016/679 and the Irish Data Protection Act 2018.*