

Artificial intelligence Policy (external)

1. Purpose

This policy outlines how PebblePad uses Artificial Intelligence (AI) in products and services. We aim to ensure transparent, and responsible AI practices that align with our values and legal obligations.

2. Scope

This policy applies to all AI systems developed, deployed, or used by PebblePad that interact with our users

3. Contact

3.1. For questions about our use of AI, please contact:

Data Protection Officer

Email: datasecurity@pebblepad.co.uk

4. Generative AI features

4.1. Transparency is a core value for us. We are committed to ensuring that our customers clearly understand how our AI features operate, empowering them to maintain compliance and protect their data with confidence.

4.2. Our primary approach to offering AI features within the platform is through an opt-in model. This ensures that customers retain full control over any additional data processing activities carried out by our AI systems

Feature	Details on processing	Generative AI provider	Further information
AI Assisted Workbook Generation (BETA)	User inputs used via the AI wizard to create the desired workbook are sent to the AI model.	OpenAI	User inputs & resulting model outputs are retained by OpenAI for our logging &

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	No other Personal Data is being shared with the AI model.		monitoring purposes.
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5. Third-Party AI

- 5.1. We assess third-party AI tools for compliance with our internal policies, best practice and applicable standards.
- 5.2. Contracts with vendors include AI-specific clauses on data use, transparency, and accountability.

6. Guiding Principles

- 6.1. Transparency
 - 6.1.1. We clearly disclose when users are interacting with AI systems.
 - 6.1.2. We provide accessible explanations of how AI systems function and make decisions, where appropriate.
- 6.2. Accountability
 - 6.2.1. Human oversight is maintained over all AI systems in use.
 - 6.2.2. We assign responsibility for AI outcomes to appropriate roles within the organization.
- 6.3. Security and Reliability
 - 6.3.1. AI systems within PebblePad are tested and monitored for robustness, performance, and misuse via the use of manual testing, using best practice benchmarking & evaluation techniques against prompts, models and their outputs.
 - 6.3.2. The necessity of monitoring is decided based upon a risk assessment of the AI tool, conducted prior to implementation.

7. Continuous Improvement

- 7.1. We highly value user feedback as it helps us continuously improve our AI features.
- 7.2. if you would like to raise any queries on the use of AI systems in pebblepad please contact datasecurity@pebblepad.co.uk

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- 7.3. to provide any feedback on our AI systems please contact
- 7.4. We regularly review and update our AI systems and this policy.
- 7.5. We stay informed of evolving best practices, regulations, and societal expectations.

Document Control

This policy has been issued under the Information Security officers signature on behalf of the board of directors and available to all staff on share point.

Print Name:

Signed:

Date:

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Document Owner	Information Security Officer
Date Created	20/10/25

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1	20/10/25	Information security officer	Initial issue