

Edulution Information Impact Assessment

This is the information impact assessment document of Edulution entities, comprising entities registered in Switzerland, Namibia, Zambia and South Africa, whether part of a group of companies and or whether using the Edulution name by virtue of having concluded a license agreement with Edulution Holdings SA (referred to as (Edulution entities)¹.

GENERALLY

Measures taken to protect information:

1. Information is stored electronically, with appropriate level of access given depending on operational requirements
2. Computers are password protected, and computers are kept in safety of the user unless in locked in the offices outside of office hours.
3. Information is only made available to our tax advisors for the purposes of tax compliance with SARS for the purposes of income tax (PAYE) and VAT and income Tax compliance and the department of labour for the purposes of UIF and Workmen's compensation.
4. Where hard copies of information are kept, the documents are locked in a secure office with only authorized staff members having access to it.
5. Records are only retained for as long as it is required by law to be kept whereafter it is destroyed.
6. IT functionality has been allocated to appropriately qualified staff to ensure data privacy is adequately protected.
7. Where photographic images are used for marketing purposes of learners and coaches, explicit consent is obtained before use of the video or photographic content.

STORAGE OF DATA

1. Edulution's data is stored on the Google Cloud Servers in Europe which uses General Data Protection Regulation (GDPR) to protect user data. It permits Edulution to collect, store and use anonymised data. It protects private and sensitive information by encrypting identifiers that connect an individual to stored data.
2. Learner data is stored, collected and transferred from its centres to the Google Cloud Servers using Public and Private Key Encryption.
3. Access to Edulution data is controlled through user profiled SSL encrypted passwords and protocols exist to detect and alert any restricted access activity.
4. Edulution's visualisation tools (reporting platform) allow encrypted password protected access to selective, aggregated and pre-processed data.
5. Where any sensitive or personal information is shared (monthly learner report showing performance of the learners on the program in a previous month) it is to audiences who are bound to uphold the privacy of the information (e.g. Edulution sponsors) or to audiences (e.g. education officials, teachers and learners) who work and have access to similar information (a list showing maths test results of learners on a classroom noticeboard) as a part of their normal "course of operations".

¹ It should be noted that due to the fact that Edulution entities operate in a number of jurisdictions, the entities are subject to different legislation and regulations. Notably in South Africa, the Edulution entity is subject to the Protection of Personal Information Act 2013, the provisions and requirements of which this Information Impact Assessment document has incorporated and taken cognizance of.

Annexure A to this policy contains the additional Information impact Assessment measures as are required in the South African context specifically and only applies to Edulution Learning NPC, an entity registered in South Africa.

ANNEXURE A

This annexure and the measures contained therein apply to Edulution Learning NPC only in order to ensure its compliance with the Protection of Personal Information Act 2013.

Measures taken by the organization generally in the compliance with Protection of Information Act ('POPIA):

1. An information officer has been appointed.
2. A privacy policy has been prepared and uploaded on the website
3. A Manual setting out the process to apply for information in terms of Promotion of Access to Information Act has been prepared and uploaded onto the website.
4. Staff have been trained on the impact of POPIA and the company has satisfied itself that the staff are adequately aware of the impact of POPIA on the business operations.
5. Data processing agreements have been concluded with relevant suppliers and service providers.
6. This information impact assessment will be reviewed and updated annually.

Types of information held

1. INFORMATION KEPT IN TERMS OF OTHER LEGISLATION

Records are kept in accordance with the legislation applicable to **Edulution**, which includes but is not limited to:

- Basic Conditions of Employment Act, No. 75 of 1997;
- Companies Act, No. 61 of 1973
- Companies Act, No. 71 of 2008;
- Compensation for Occupational Injuries and Diseases Act, No. 130 of 1993;
- Constitution of the Republic of South Africa 108 of 1996;
- Consumer Protection Act, No. 68 of 2008;
- Copyright Act, No. 98 of 1978;
- Currency and Exchanges Act, No. 9 of 1933;
- Credit Agreements Act, No. 75 of 1980;
- Debt Collectors Act, No. 114 of 1998; 5
- Electronic Communications and Transactions Act, No. 25 of 2002;
- Employment Equity Act, No. 55 of 1998;
- Financial Intelligence Centre Act, No. 38 of 2001;
- Income Tax Act, No. 58 of 1962;
- Labour Relations Act, No. 66 of 1995;
- National Credit Act, No. 34 of 2005;
- Occupational Health and Safety Act, No. 85 of 1993;
- Protection of Personal Information Act, No.4 of 2013;
- Regulation of Interception of Communications and Provision of Communication Related Information Act, No. 70 of 2002;
- Skills Development Act, No. 97 of 1998;
- Skills Development Levies Act, No. 9 of 1999;
- Trade Marks Act, No. 194 of 1993;

- Unemployment Insurance Act, No. 63 of 2001;
- Unemployment Insurance Contributions Act, No. 4 of 2002;
- Value Added Tax Act, No. 89 of 1991.

2. INFORMATION FREELY AVAILABLE

The following general information is available in the public domain and does not require an official request in terms of the Act:

- Newsletter
- News
- Brochures
- Photo gallery
- Packages and promotions
- Products and services
- Location and directions
- Privacy policy
- PAIA Manual

3. INFORMATION KEPT BY EDULUTION IN TERMS OF THE ACT

(Information required under section 51(1)(d) of the Act)

Financial Records

- Annual financial statements of Edulution
- Tax returns of Edulution
- Accounting records of Edulution
- Banking records of Edulution
- Audit reports conducted for Edulution
- Invoices in respect of creditors and debtors of Edulution
- Bank facilities and account details

Company Records

- Documents of incorporation
- Memorandum and Articles of Association
- Share register and other statutory registers
- List of employees
- Contracts of employment with employees of Edulution

Funder agreements

- Agreements concluded with funders
- Quarterly progress reports to funders
- Details of funders

Human Resources

- Personnel records of each employee and Franchisee of Edulution including ID, police clearance, residential address and attendance registers
- Disciplinary records
- Compensation or redundancy payments
- Records relating to conditions of employment
- Employment equity plan of Edulution
- Employee tax information

- Training schedules and manuals
- Agreements with clients of Edulution
- Files relating to client matters
- Payroll records
- Internal policies and procedures of Edulution

Learners

- Learner documentation including full names, Date of Birth, Gender, , Grade and school details, and learner assessments conducted and attendance registers
- Correspondence with Learners and parents including the granting of permission to use visual material of learners in Edulution corporate correspondence and marketing purposes
- Correspondence with third parties
- Research conducted by Edulution
- Other information relating to, or held on behalf of Edulution
- Licences relating to intellectual property rights

Intellectual Property

- Trade-marks, copyrights and designs held by Edulution
- Software licences

Immovable and Movable Property

- Agreements for the lease of immovable property by Edulution
- Agreements for the lease or sale of movable property by Edulution
- Records regarding insurance in respect of movable property
- Records regarding insurance in respect of immovable property
- Asset register

Information Technology

- Records regarding computer systems and programmes held by Edulution

Website

- Edulution's website address is **www.edulution.org** and is accessible to anyone who has access to the Internet. The website contains various categories of information relating to the business, including service offerings, employees, funders, contact information and blog articles.

Miscellaneous

- Security agreements, guarantees and indemnities
- Marketing agreements
- Internal correspondence
- Agreements with suppliers of Edulution
- Correspondence of Edulution