



Edulution IT and Cybersecurity Policy

August 2025

1. Purpose

The purpose of this IT and Cybersecurity Policy is to establish guidelines for the secure, responsible, and lawful use of information technology (IT) systems, software, and infrastructure within Edulution. Edulution operates across South Africa and Zambia to provide mathematics support programmes for primary school children. This policy complements the Edulution Data Protection Policy by focusing on the management and protection of IT systems and cybersecurity risks, while personal data protection is governed by the Data Protection Policy.

2. Scope

This policy applies to:

- All IT infrastructure, devices, networks, cloud services, and software used by Edulution, including the adaptive learning platform Mindspark provided by Educational Initiatives (Ei).
- All employees, contractors, franchisees, volunteers, and third-party service providers who use, maintain, or support Edulution's IT resources.
- All locations where Edulution operates, including South Africa, Zambia, Switzerland, and India (for intellectual property and data-sharing related to third-party educational content).

3. Definitions

- IT Systems: Includes computers, servers, mobile devices, networks, cloud environments, software applications, and other technology assets.
- Cybersecurity Incidents: Any event that threatens the confidentiality, integrity, or availability of IT systems or data.
- User Access Controls: Mechanisms that restrict IT system access to authorized personnel only.
- Data Protection Policy: The Edulution policy governing the lawful processing, security, and rights related to personal information.

4. IT Asset Management

Edulution will maintain an inventory of all IT assets and assign responsibility for their management. Employees and contractors must use Edulution IT assets only for authorised purposes. Any personal use must comply with applicable laws and organisational rules.

5. Access Control and Authentication

Access to IT systems will be granted based on the principle of least privilege and need-to-know. Users must employ strong authentication methods, including unique usernames and passwords, and where applicable, multifactor authentication. Access rights will be regularly reviewed and revoked promptly upon termination of employment or contract or change in role.

6. Network and System Security

Edulution will implement and maintain appropriate technical controls to safeguard its IT infrastructure, including:

- Firewalls, antivirus, and anti-malware systems.
- Network segmentation to reduce risk exposure.

- Regular system updates and patch management to address security vulnerabilities.
- Encryption for sensitive data in transit and at rest, where applicable.

7. Incident Management

All suspected or confirmed cybersecurity incidents must be reported immediately to the designated IT Security Officer. Incidents will be assessed promptly, contained, mitigated, and documented. Where personal data may be affected, the Data Protection Policy and the appointed Data Protection Officer (DPO) must be consulted for breach notification obligations.

8. User Responsibilities and Awareness

All users of Edulution IT systems must:

- Comply with this policy and the Data Protection Policy.
- Participate in required cybersecurity and data protection training sessions.
- Report lost or stolen devices or any IT security concerns immediately.
- Ensure that electronic communications are professional and lawful.

9. Third-Party IT Services and Partnerships

Third-party IT service providers and partners must comply with Edulution's IT security requirements and data protection standards as set out in relevant policies, including the Data Protection Policy. Contracts with third parties will include clauses on data security, confidentiality, and compliance with applicable regulations in South Africa, Zambia, Switzerland, and India.

10. Backup and Recovery

Edulution will implement regular backup procedures for critical IT systems and data. Backup copies will be securely stored and periodically tested for restoration capability to ensure business continuity in case of data loss or system failure.

11. Compliance and Monitoring

Edulution will regularly monitor IT systems for compliance with this policy and applicable cybersecurity standards. Non-compliance and security weaknesses will be addressed in a timely manner. Internal audits and risk assessments will be performed periodically.

12. Policy Review

This policy will be reviewed at least annually or when significant changes occur in IT infrastructure, applicable laws, or cybersecurity threats. It works in conjunction with the Edulution Data Protection Policy, which should be referred to for rules related to personal information handling and protection.

Signed:

Guy Greenblat

Richard Akwei

Guy Greenblat – IT Security Officer (Acting)

Richard Akwei - CEO



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Document 1 of 1

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