

KOLOSO

Data Privacy and Protection Policy

Version 3.0 | Effective Date: 6 March 2026 | www.koloso.app

1. Who we are

Koloso Ltd (“Koloso”, “we”, “us”, or “our”) is an educational technology company registered in Zambia. We operate the Koloso Teaching Support System — a digital platform designed to support primary school teachers with lesson planning, curriculum-aligned guidance, formative assessment, and progress reporting.

Koloso is the data controller for personal data processed through our platform. In jurisdictions where a local representative is required, details are provided in Section 10.

Contact: Data Protection

Data Protection Officer: Sipiwe Munsaka (COO) | Email: sowi@koloso.com

2. Who this policy covers

This policy applies to all personal data we collect and process in connection with the Koloso platform. The individuals whose data we process include:

- School administrators and head teachers who subscribe to and manage Koloso accounts
- Teachers who use the Koloso platform in their professional capacity
- Students whose assessment and progress data is recorded through Koloso
- Parents or guardians who receive Koloso-generated progress reports
- Visitors to our website (koloso.app)

Children’s data — our absolute commitment

Koloso processes data relating to children (students under 18) only for the purpose of supporting their education. Children’s data is never used for advertising, marketing, commercial profiling, or any purpose unrelated to the educational service. This commitment is unconditional and non-negotiable.

3. What data we collect

3.1 School and teacher data

Category	Examples
Account data	School name, address, head teacher name, billing contact, email address, phone number
Teacher profile data	Name, email address, subject(s) and grade(s) taught, teaching competency records
Usage data	Login times, features used, lesson plans created, assessments administered, reports generated
Communications	Support requests, feedback, survey responses

3.2 Student data

Student data is processed only through the school's subscription and only under the instruction of the subscribing school (which is the data processor for student data in its institutional context). We process:

Category	Examples
Identity data	First name, grade/class, student identifier (as assigned by the school)
Assessment data	Responses to formative assessment items, scores, learning gap analysis results
Progress data	Performance over time against specific curriculum learning objectives
Report data	Aggregated progress summaries shared with school leaders and parents

We do not collect student surnames, home addresses, contact details, photographs, biometric data, health data, or any sensitive personal data as defined under the Zambia Data Protection Act 2021, unless this is expressly required and consented to for a specific purpose.

3.3 Website data

When you visit koloso.app we may collect standard analytics data (page views, session duration, device type, browser type, approximate location) through privacy-preserving analytics tools. We do not use third-party advertising trackers.

4. Why we process data and our legal basis for doing so

Purpose	Legal basis
Providing the Koloso service to subscribing schools	Contract (performance of agreement with the school)
Teacher account management and authentication	Contract
Processing student assessment and progress data to generate reports	Contract (school instructs us as data processor for student data)
Sending service communications (updates, receipts, support)	Contract / Legitimate interests
Improving and developing the Koloso platform	Legitimate interests (product development) — data anonymised before use
Compliance with legal obligations (tax, regulatory)	Legal obligation
Fraud prevention and platform security	Legitimate interests
Research and evidence of educational impact (anonymised and aggregated only)	Legitimate interests / Consent where required
Marketing communications to schools (not students)	Consent (opt-in)

We do not rely on legitimate interests as a basis for processing children’s personal data in any way that is not directly necessary for the delivery of the educational service.

5. How we use children’s data

UNICEF EdTech for Good Framework alignment

Koloso is committed to full compliance with UNICEF’s EdTech for Good Framework child data protection principles. The following commitments are absolute and apply regardless of jurisdiction.

Children’s data processed through Koloso is subject to the following absolute restrictions:

- **No advertising:** children’s data is never used to target advertising to students, their families, or their schools.
- **No commercial profiling:** we do not build commercial profiles of students or use student data to infer characteristics for commercial purposes.
- **No selling or licensing:** student data is never sold, licensed, or shared with third parties for commercial gain.



- **No behavioural tracking beyond the educational service:** we do not track students' behaviour outside the Koloso platform.
- **Minimum necessary:** we collect only the student data strictly necessary to deliver the educational service.
- **School control:** subscribing schools retain control over their students' data and may request deletion at any time.

All third-party services used by Koloso (cloud hosting, analytics) are contractually prohibited from using student data for any purpose other than providing the service to Koloso.

6. How we store and protect data

6.1 Storage

Personal data is stored on secure cloud infrastructure. We take reasonable steps to ensure data relating to Zambian users is stored within Zambia or in jurisdictions with equivalent or stronger data protection standards. Where data is stored or processed outside Zambia, we ensure appropriate contractual safeguards are in place, consistent with Section 70–71 of the Zambia Data Protection Act 2021.

6.2 Security measures

We implement technical and organisational measures to protect personal data against unauthorised access, disclosure, alteration, or destruction, including:

- Encryption of data in transit (TLS) and at rest
- Access controls and role-based permissions: only authorised personnel can access personal data
- Regular security reviews and vulnerability assessments
- Staff training on data protection obligations
- Incident response procedures including 24-hour breach notification to the Zambia Data Protection Commissioner as required by Section 49 of the Data Protection Act 2021

6.3 Retention

We retain personal data for as long as the school's subscription is active and for a minimum of one year thereafter, consistent with Section 51 of the Zambia Data Protection Act 2021. Schools may request earlier deletion. Student data is deleted (or anonymised for research purposes, with school consent) within 30 days of a school's subscription termination.

7. Sharing data

We do not sell, rent, or trade personal data. We may share data only in the following circumstances:



- With the subscribing school: school administrators have access to all data associated with their school’s subscription.
- With parents or guardians: where the school has enabled parent reporting, Koloso-generated progress reports are shared with designated parents. Schools control which parents receive reports.
- With service providers: we use vetted third-party providers (cloud hosting, email delivery) under data processing agreements that prohibit use of data for any purpose other than the contracted service.
- For legal compliance: where we are required by law, court order, or regulatory authority, including the Zambia Data Protection Commissioner.
- In the event of a change of ownership: if Koloso is acquired or merged, data protection commitments will be maintained as a contractual condition of any transaction.

8. Your rights

Data subjects (teachers, school staff, and students through their schools) have the following rights under the Zambia Data Protection Act 2021 and applicable laws in South Africa (POPIA), Nigeria (NDPR), and Uganda (Data Protection and Privacy Act 2019):

Right	What it means in practice
Access	Request a copy of the personal data we hold about you
Correction	Request that inaccurate or incomplete data be corrected
Erasure	Request deletion of your data (subject to legal retention requirements)
Objection	Object to processing of your data, including for direct marketing
Restriction	Request that we limit how we use your data in certain circumstances
Portability	Request your data in a structured, machine-readable format
Withdraw consent	Where processing is based on consent, withdraw it at any time without penalty

To exercise any right, contact us at privacy@koloso.com. We will respond within 30 days. Schools may exercise rights on behalf of their students by contacting us directly.

9. Multi-jurisdiction compliance

Koloso operates across multiple African jurisdictions. In addition to the Zambia Data Protection Act 2021 (our primary regulatory framework), we align with:

Jurisdiction	Applicable framework
Zambia	Data Protection Act No. 3 of 2021; Cyber Security and Cyber Crimes Act No. 2 of 2021
South Africa	Protection of Personal Information Act (POPIA) 2013, effective 1 July 2021
Nigeria	Nigeria Data Protection Regulation (NDPR) 2019; Nigeria Data Protection Act 2023
Uganda	Data Protection and Privacy Act 2019
International (UNICEF)	UNICEF EdTech for Good Framework child data protection principles

Where requirements across jurisdictions differ, we apply the most protective standard.

10. Cookies and website analytics

Our website uses essential cookies required for the site to function, and optional analytics cookies to understand how the site is used. We do not use advertising cookies or third-party tracking technologies. You can manage cookie preferences through the cookie settings panel on our website.

11. Changes to this policy

We will notify subscribing schools of any material changes to this policy by email at least 30 days before changes take effect. The current version will always be published at koloso.com/privacy. The version date appears in the footer of this document.

12. How to contact us or make a complaint

For any data protection enquiries: sowi@koloso.app

If you are not satisfied with our response, you have the right to lodge a complaint with the relevant regulatory authority:

- Zambia: Data Protection Commission (dataprotection.gov.zm)
- South Africa: Information Regulator (info regulator.org.za)
- Nigeria: Nigeria Data Protection Commission (ndpc.gov.ng)
- Uganda: Personal Data Protection Office (pdpo.go.ug)