**EduOrbia Zimbabwe**

PRIVACY POLICY

# Privacy Policy

What personal information we collect, why, who sees it and your rights.

| VERSION | EFFECTIVE | PUBLISHED |
|---|---|---|
| 1 | 1 December 2026 | 9 November 2026 |

> **What changed:** First version

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EduConnect Zimbabwe ("we", "us") runs EduConnect Zimbabwe in Zimbabwe. This policy explains what personal information we collect, why, who we share it with, how long we keep it and what choices you have. It applies to our website and mobile app. It should be read with our Terms and Conditions. Questions about your information go to support@educonnect.ac.zw.

## 1. Information we collect

### Information you give us

- **Account details:** your name, email address, phone or WhatsApp number, and a password (we store only a protected form of it). If you sign in with Google, Microsoft or LinkedIn we receive the basic profile details they share with us.
- **Students:** date of birth, gender (optional), province and district, examination board and educational level, subjects of interest, a profile picture, and the name, phone and email of a parent or guardian where needed.

- **Parents and guardians:** your details and the details of the children you manage.
- **Teachers:** a profile (subject, levels, experience, bio, where you teach, availability), qualifications you choose to add, and the verification material we ask for, which can include identity documents, a passport photo, police clearance, registration with an examination board and answers to our verification questions.
- **Institutions and their staff:** the institution's name, address, contact person, registration number, accreditation documents, facilities, and the details of staff you add.
- **Advertisers:** company name and billing address and email, and the advertisements and files you submit.
- **Content you create:** messages and attachments, community posts and replies, uploaded learning materials, assignments and submissions, quiz and competition entries, reviews and ratings, and survey answers.
- **Payments:** which bookings, deposits, credits, withdrawals and fees you have paid or received, and payout details for providers. Card and mobile-money details are handled by our payment provider.

### Information collected automatically

- **Security records:** sign-in attempts (successful or not), the network address and device information they came from, two-factor events, and actions taken by our staff in the admin tools.
- **Service records:** booking and lesson history, call records (who joined which lesson and when, not the content of the call), notifications sent to you, and your preferences.
- **Advertising records:** when an advertisement is shown and clicked, so we can report to advertisers and prevent click fraud. We do not build advertising profiles of you.
- **Device storage:** small items kept in your browser or app, described in our Cookie and Device Storage Policy.

## 2. Why we use it

- To create and secure your account, verify your contact details and keep you signed in.
- To match learners with teachers and institutions, take bookings, run lessons and calls, and handle payments, credit, deposits, commission, payouts and withdrawals.
- To verify teachers and institutions and protect children (see section 7).
- To provide messaging, community, learning materials, competitions, assignments and notifications.
- To review content and advertisements against our rules, and to investigate reports, disputes and fraud.
- To show advertisements and report on them.
- To get your feedback through surveys, to run our referral programme and to improve the service.
- To meet our legal obligations and to keep records we need to defend our rights.

Where the law asks for a legal basis, we rely on: performing our agreement with you; your consent (for example parental consent for a child's account); our legitimate interests in running a safe and sustainable service; and compliance with the law.

## 3. Who sees your information

- **Other users, as needed for the service.** A learner and the provider they book see each other's name and the details of the booking. Teacher and institution profiles are visible to people browsing for lessons. Community posts are visible to the community. A parent or guardian sees the activity of the children they manage. If you were referred, the person who referred you sees only your first name and last initial, your role and your status.
- **Our staff,** only as far as their role needs, with access recorded in audit trails.
- **Service providers who work for us,** only for the tasks we give them:
  - our payment provider (currently Pesepay), to take payments;
  - email, SMS and WhatsApp providers (for example Twilio), to send verification codes and notices;
  - video calling providers (our own LiveKit server for standard calls and Daily.co for premium calls with video);
  - sign-in providers (Google, Microsoft, LinkedIn), if you choose to use them;
  - AI providers (for example Anthropic, OpenAI, Google, DeepSeek or xAI) that we configure for the tasks in section 4;
  - our hosting and backup providers.
- **Authorities and others where the law requires it,** or where it is needed to protect a child, prevent a crime or enforce our rights.
- **A buyer or successor,** if our business is sold or reorganised, under the same protections.

We do not sell your personal information.

## 4. Artificial intelligence

We may send limited content to AI providers so that they can advise our staff or help run a feature, for example the text of a community post or reply for a first review, text of an advertisement or learning material for an advice note to a reviewer, or only the names of a subject, level and exam board to draft a list of topics. A person still makes the decisions that affect your account, money or access, except that a clear AI approval may publish a community post (it is then labelled). We keep a log of AI use, including what it was about and the result. AI features can be switched off, and we choose providers carefully, but information sent to a provider is handled under that provider's terms as well as ours.

## 5. Children's information

Children below 13 can have an account only through a parent or guardian, who gives consent and receives the notices about the child. We collect only what is needed to teach and protect a learner. For learners under 18, free-text "about me" profiles are not available, messaging is limited, physical lessons go through a parent or guardian, and the information we show other users is kept to the minimum. Parents and guardians may ask us at any time to see, correct or delete their child's information.

## 6. How long we keep information

We keep information for as long as your account is active and for as long afterwards as we need it for the purposes in this policy, for example to settle payments, resolve disputes, meet tax and accounting rules, and keep safeguarding records. Some records, such as financial and audit records, and the published terms you accepted, are kept even after an account is closed. When we no longer need information we delete it or make it anonymous. If you ask us to delete your account, we will delete what we can and tell you what we must keep and why.

## 7. Safety and safeguarding records

To protect children we check teachers and institutions before they can teach, record the version of our Code of Conduct and Child Safeguarding Policy they have agreed to and when, keep reports and their outcomes, and may share information with the right authorities where a child may be at risk. See the Child Safeguarding Policy.

## 8. How we protect your information

We use measures suited to the risk, including encrypted connections, hashed passwords, optional two-factor sign-in, secret keys and credentials stored encrypted, restricted staff access with audit trails, automatic blocking of repeated failed sign-ins, and encrypted off-site backups. No system is completely secure. If a breach affects your information in a way that may harm you, we will tell you and the authorities as the law requires.

## 9. Where your information is processed

Our service is hosted on servers we manage. Some of our providers (for example email, video, payment, sign-in and AI providers) process information in other countries. Where that happens we take steps so that your information stays protected as the law requires.

## 10. Your choices and rights

Subject to the law, you may ask us to: tell you what information we hold about you, correct it, delete it, restrict or object to some uses of it, or give you a copy. You may withdraw consent you have given (this does not affect what we did before), change your notification and security settings in the app, and turn on two-factor sign-in. To use these rights, email support@educonnect.ac.zw. We may need to confirm who you are first, and we may keep information we are legally required or entitled to keep. If you are unhappy with our answer, you may complain to the data protection authority in Zimbabwe.

## 11. Marketing and notifications

We send service messages (verification codes, booking, payment, security and policy notices) which you cannot opt out of while you have an account. Optional messages can be switched off in the app.

## 12. Changes to this policy

We may update this policy. Each version has a number and an effective date, older versions stay available, and we will tell you about important changes.

## 13. Contact

EduConnect Zimbabwe, Zimbabwe. Email: support@educonnect.ac.zw. This policy is governed by the laws of Zimbabwe.