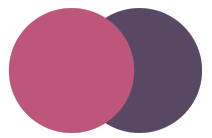




Information Security Policy

SOWISO B.V, including its trademarks
Bolster Academy
Online Mathematics Placement Test
PassYourMath

Version: 5.1 - October 2023
Owner: Max Cohen, TD
Confidentiality level: Public
Approved by management: Yes



1 Context and goals

Founded in 2010, SOWISO provides an interactive, personalized and adaptive e-learning technology for mathematics and other exact sciences. SOWISO is currently faced with the following external issues:

- Digitalisation of higher education, especially the need to do digital examinations. This is a growth opportunity for SOWISO but also means that SOWISO will manage more confidential personal data, like individual test results.
- Customers are more aware of security and privacy. This leads to more detailed questions about SOWISO security measures and procedures.
- There's an increased number of cyber attacks on companies and technical vulnerabilities are being exploited quicker than ever.

Next to that, SOWISO has the following internal issues:

- International growth. SOWISO is expanding, and intends to expand, into other European countries and North America. International clients have new or different needs when it comes to security and privacy and may require more detailed agreements.
- The quick growth of SOWISO's workforce offers a new challenge to keep everybody informed about our security procedures and aware about security in general.
- SOWISO has become a part of the Paragin group and will collaborate with the group across various departments.

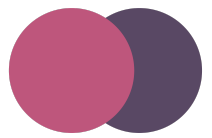
The vision of SOWISO is to continuously improve the STEM learning experience through digital technologies.

The SOWISO strategic objectives for 2023 are summarized as follows:

1. Scale, in terms of; users, revenue, employees, content.
2. Product. Offer the best solution in our niche e-learning platform for STEM in higher education.
3. Content. Deliver high quality content. Our educational material should be top notch.
4. Customer success. Help our partners be successful.

Information security is an important aspect of our business in all aspects: We need to protect the data from our own company, our customers and users of our technology.

This policy document describes the information security management system (or ISMS) that our company uses. Anyone in our company (or at key positions at suppliers) that is handling confidential or sensitive data should be aware of this policy and act in accordance with it. Also, if anyone observes something in our company that is not in line with this policy, he or she should report this immediately. This can be done either by informing our information security officer, or to any member of the security team. The entire management team of our company has been involved in creating this policy and is fully committed to making sure we are compliant.



2 Scope

Information security related to the development and provisioning of SOWISO's e-learning solutions.

Within this scope, we provide the following main activities and provide the following services to customers:

- The SOWISO platform and digital math courses, including our brands Bolster Academy, OMPTest and PassYourMath
- Custom software development
- Entrance / Placement tests for students

The following departments are in scope of this policy:

- Marketing & Sales
- Research & Development
- IT
- Customer service

SOWISO does not directly manage any data centres. Amazon Web Services and Google LLC are used as a provider of IT infrastructure.

3 Stakeholder analysis

The management team is responsible for maintaining regular contact with stakeholders, understanding the information security requirements and expectations from stakeholders and making sure that the ISMS is aligned with the stakeholder requirements and expectations. The resulting information is documented in the stakeholder analysis, which will be updated annually. The stakeholder analysis will cover at least:

- Customers
- Users
- Suppliers
- Regulatory requirements such as GDPR

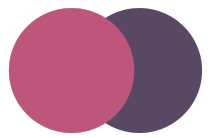
The stakeholder analysis falls under the responsibility of the Security team.

4 Leadership

The entire management is aware of the information security policy and is committed to support this effort on an ongoing basis. The TD is the management representative that interfaces directly with the security team.

There is an information security team that is responsible for implementing and maintaining information security.

All other staff of the company are regularly updated by the information security team and are responsible for following policies and guidelines in place.



5 Risk assessment and treatment

The security team uses a methodology for continuous improvement. Using this methodology, the security team is aware of the company goals, defines actions, checks if the actions are effective and makes changes if needed. The methodology chosen is Plan-Do-Check-Act, a well-known methodology also referred to as the Deming cycle (<https://en.wikipedia.org/wiki/PDCA>). The risk assessment and treatment falls under the responsibility of the TD.

6 Resources, awareness and training

The HR responsible makes sure that when an employee joins the organization, an information security training is scheduled in the first week.

A security awareness training is organized at least once a year. This training is mandatory for all staff handling information. If employees have not received or attended the training, they must contact the security team.

Staff involved in product design and development or staff with additional security responsibilities will receive additional training suitable to their role.

7 Operations

We maintain concrete measurable goals to assess the health of our ISMS that are periodically reviewed and updated. These goals are managed by the TD and stored in document 'KPI's & goals - KPI-overview'.

8 Performance evaluation

The management team will review that effectiveness of the ISMS annually in a management review. The TD is responsible for maintaining an internal audit programme that establishes whether the ISMS conforms to ISO 27001:2022 and SOWISO's own requirements.

If needed, external support will be sought by external partners, such as additional technical advice, independent security testing, or audits by independent parties.

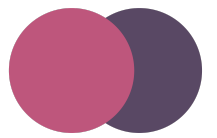
9 Continuous Improvement

The management is committed to continuously improve the information security system. This is done by documenting and analysing stakeholders, consulting external sources of expertise.

10 Appendix 1: Information Security team composition

The Security team consists of the following roles:

1. Technical Director (TD)



2. Security Officer(s)

The team can be extended with other senior staff members if needed.