

PRIVACY POLICY OF KLAKPAD

- **INTRODUCTION**

Klakpad Global Limited (Klakpad) respects your privacy and is committed to protecting your Personal Data. This Privacy Policy will inform you as to how we look after your Personal Data when you log into the application and tell you about your privacy rights and how the law protects you.

- **SCOPE AND CONSENT**

By executing or signing the document attached, you accept the terms of this Privacy Policy and consent to our collection, use, disclosure, and retention of your information as described herein (including to contact you), and for all other purposes permitted under applicable personal information privacy statutes, credit bureau reporting rules, anti-spam legislation, and consumer protection laws.

For the avoidance of any doubt, this Privacy Policy is to be reviewed under the Nigeria Data Protection Regulation (NDPR) and the applicable laws of Nigeria.

- **IMPORTANT INFORMATION AND WHO WE ARE**

- Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how Klakpad collects and processes your Personal Data through your use of this application, including any data you may provide through this application.

- Data Controller

Klakpad Global Limited is the data controller and is responsible for your Personal Data (collectively referred to as “Klakpad”, “we”, “us” or “our” in this Privacy Policy). However, Klakpad will also act as data processor, depending on specific contractual obligations that they are known to you.

- Changes to the Privacy Policy and Your Duty to Inform us of Changes.

We keep our Privacy Policy under regular review. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

- Third-Party Links

The present document may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our application, we encourage you to read the Privacy Policy of every website, plug-in, or application you visit.

- **THE DATA WE COLLECT ABOUT YOU**

- Personal Data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

- We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- Identity Data

This includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

- Contact Data

This includes billing address, delivery address, email address and telephone numbers.

- Financial Data
This includes bank account and payment card details.
- Transaction Data
This includes details about payments to and from you.
- Technical Data
This includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this application.
- Profile Data
This includes your username and password, history of transactions entered into by you, feedback and survey responses.
- Usage/Behavioural Data
This includes information about how you use our applications and services.
- Marketing and Communications Data
This includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific application feature. However, if we combine or connect aggregated data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.
- We do not collect any Special Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.
- Where we need to collect Personal Data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a loan). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.

• **HOW IS YOUR PERSONAL DATA COLLECTED?**

We use different methods to collect data from and about you including through:

- Direct Interactions
You may give us your Identity, Contact and Financial Data by filling in forms on the application or by corresponding with us by email. This includes Personal Data you provide when you:
 - apply for our products or services;
 - create an account on our application;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - give us feedback or contact us.

- Automated Technologies or Interactions

As you interact with our applications and services, we will automatically collect Technical Data about your devices, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites and applications employing our cookies.

- Third Parties or Publicly Available Sources.

We will receive Personal Data about you from various third parties and public sources including the following:

- Technical Data from the following parties:
 - analytics providers;
 - advertising networks; and
 - search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services
- Identity and Contact Data from data brokers or aggregators
- Identity and Contact Data from publicly available sources

- **HOW WE USE YOUR PERSONAL DATA**

- We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you or another party, to which we are acting as Data Processors.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

- Generally, we do not rely on consent as a legal basis for processing your Personal Data although we will get your consent in cases such as before sending third party direct marketing communications to you via email or text message. You have the right to withdraw your consent at any time by contacting us.

- **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

- We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

- Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your Personal Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful basis for processing including basis of Legitimate Interest
To register you as a new customer	<ul style="list-style-type: none"> • Identity • Contact 	Performance of a contract with you
To profile/assess, process and deliver your order including:	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary for our legitimate interests

<ul style="list-style-type: none"> • Manage payments, fees and charges • Collect and recover money owed to us 	<ul style="list-style-type: none"> • Financial • Transaction • Marketing and Communications 	(to recover debts due to us)
<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> • Notifying you about changes to our terms or Privacy Policy • Asking you to leave a review or take a survey 	<ul style="list-style-type: none"> • Identity • Contact • Profile • Marketing and Communications 	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
<p>To administer and protect our business and this application (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) • Necessary to comply with a legal obligation
<p>To deliver relevant application content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> • Identity • Contact • Profile • Usage • Marketing and Communications • Technical 	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
<p>To use data analytics to improve our application, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> • Technical • Usage 	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our application updated and relevant, to develop our business and to inform our marketing strategy)
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<ul style="list-style-type: none"> • Identity • Contact • Technical • Usage • Profile • Marketing and Communications 	Necessary for our legitimate interests (to develop our products/services and grow our business)

- Marketing

We may provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising.

- Promotional Offers from Us

- We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).
- You will receive marketing communications from us if you have requested information from us or entered into an agreement with us and you have not opted out of receiving that marketing.
- **Third-Party Marketing**
We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.
- **Opting Out**
 - You can ask us or third parties to stop sending you marketing messages by contacting us at any time.
 - Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product/service purchase, product/service experience or other transactions.
- **Change of Purpose**
 - We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
 - If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
 - Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

- **DISCLOSURES OF YOUR PERSONAL DATA**

- We may share your Personal Data with the parties set out below for various purposes, included marketing, under the terms specified above.
 - Internal Third Parties.
 - External Third Parties.
 - Specific third parties
 - Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this Privacy Policy.
- We require all third parties, if engaged, to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.
- In some cases, we use suppliers located in various countries to collect, use, analyse, and otherwise process information on our behalf. We may also use subcontractors which provide services to us in connection with providing our Services to you. We put in place contractual safeguards for the protection of your personal data with such suppliers, including obligations for processing in line with applicable legal requirements.
- We do not in any event sell or lease any of your personal information.

- We may share your personal data based on a good faith belief that such disclosure is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the safety of any person.
- We may use your personal data as evidence in litigation in which we are involved, to protect the rights or safety of any person or entity, to respond to a judicial process or valid government inquiry or as otherwise required by law.

- **INTERNATIONAL TRANSFERS**

- We do not transfer your Personal Data outside countries with limited data law security.

- **DATA SECURITY**

- We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.
- We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. Informing shall take place immediately without any undue delay, and in any case no later than 24 hours from the time on which it first became apparent that the breach had taken place.
- The information to be provided in such case shall include at least the following:
 - (a) a description of the nature of the Personal Data breach, including, where possible, the categories and approximate number of Data Subjects affected, as well as the categories and approximate number of records of Personal Data affected;
 - (b) communication of the name and contact details of the person handling the breach incident, if it is different from the Data Protection Officer;
 - (c) a description of the possible consequences of the Personal Data Breach;
 - (d) a description of the taken or proposed measures to address the Personal Data Breach and, where appropriate, measures to mitigate its possible adverse effects.
- If and where it is not possible to provide the information at the same time, it may be provided gradually without undue delay.
- In any case, we shall cooperate with you or any other stakeholder and shall take all necessary actions, commercial and other, in accordance with the instructions of the competent authority, if any, for the purpose of investigating, limiting possible consequences and restoring to the fullest possible degree any Personal Data Breach.

- **DATA RETENTION**

- How long will you use my Personal Data for?
 - We will only retain your Personal Data for as long as reasonably and obligatory necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any contractual, legal, regulatory, tax, accounting or reporting obligations. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
 - To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

- In some circumstances you can ask us to delete your data (see below for further information).
- In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

- **YOUR LEGAL RIGHTS**

- Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. You have the right to the following:

- Request access to your Personal Data

This is commonly known as a “data subject access request”. This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

- Request correction of your Personal Data

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- Request erasure of your Personal Data

This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your Personal Data

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- Request restriction of processing your Personal Data

This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:

- If you want us to establish the data’s accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request transfer of your Personal Data.

You may request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Right to withdraw consent

You may withdraw consent, if previously granted, at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- If you wish to exercise any of the rights set out above, please contact us.
- No fee usually required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

- What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

- Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

- **INTERPRETATION**

- Lawful Basis

- Legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- Performance of contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Comply with a legal obligation means processing your Personal Data where it is necessary for compliance with a legal obligation that we are subject to.

- Third Parties

- Internal third parties

Other companies of the same group, which means our subsidiaries, affiliates, our holding company and its subsidiaries, acting as joint controllers or processors and provide IT and system administration services and undertake leadership reporting.

- External Third Parties

- Service providers acting as processors who provide IT and system administration services.

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- The regulators and authorities acting as processors or joint controllers, who require reporting of processing activities in certain circumstances.

- **PERSONEL / ASSOCIATES**

- The Group keeps an archive on its personnel and its associates. In this archive every employee's/associate's data are registered as described above, as in the respectful agreements and official documents and as any other information that may be deemed required according to the law and necessary for the fulfilment of the Group's legal and / or contractual obligations.
- The object of this archive is the estimation and payment of any agreed salary, the retention and payment of social security obligations, the retention and payment of the employment taxes, the payment of insurance benefits (when applied) and in general the execution of the Group's contractual, tax and social security obligations.
- Legal ground for the processing of the data mentioned above is the materialization of the employment - or any other related - agreement.
- Possible recipients of the personal data for which the Company keeps an archive are the insurance organizations, public and private, competent authorities, the payroll department of the Group – either internal, or external, the human resources department of the Group, associated accountants and auditors, as well as any other administrative, judicial or other authority or in general any legal entity or person to which the Group may have the obligation or the right, based on the law, on a contract or a judicial decision, to announce such data. Moreover, recipients of the business communication details of the employee/associate – as regards only these, namely name, surname, position, company's telephone, company's physical address and e-mail address – may be current, future and possible clients and associates of the Group in the context of the employee's/associate's tasks and the business objectives of the Group.
- The Group has taken technical measures regarding the protection of the above-mentioned data which are accessible only by authorized personnel.
- The Group shall preserve in its archive these data throughout its collaboration with the employee/associate and in case of termination for the period that the Group is obliged according to the applicable law to preserve them - only and to the minimum extent possible - for the fulfilment of its tax, social security, contractual or other legal obligations.

- **CONTACT**

- Please contact our Privacy Department with any questions or concerns regarding this Privacy Policy at dpo@klakpad.com
- If you have any questions or concerns regarding our policy, or if you believe our policy or applicable laws relating to the protection of your personal information have not been respected, you may file a complaint with our Privacy Department listed above, and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We will keep records of your request and any resolution.
- If you believe that Klakpad Global Limited is not processing your personal data in accordance with the requirements set out herein or applicable data protection laws, you can at any time lodge a complaint with the relevant supervisory authority, but is firstly expected to communicate with us.