REWOT CIRO LIMITED
- Establishing A Future Together -

+254 715 464 554
P.O. BOX 15073 - 00400
Nairobi, KENYA
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REWOT CIRO LIMITED

DATA PRIVACY POLICY

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1. DEFINITIONS

Biodata Biographical information: Personal information with regard to gender, nationality, contact information, physical location, and any other Controller means the natural or legal person, authority, organization or other agency that makes decisions individually or together with other parties regarding the purposes and means for processing Personal Data.

REWOT CIRO LIMITED Means Rewot Ciro Limited, a registered company.

GDPR Means the General Data Protection Regulation((EU) 2016/679)

Data Protection Act

Personal Data Data Protection Act no. 24 of 2019 under the laws of Kenya as amended and modified from time to time

Means any information identifying you or information relating to you that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably access. Personal Data excludes anonymous data or data that has had the identity of you as an individual permanently removed.

Processor Means a natural or legal person, authority, organization or other agency that processes Personal Data on behalf of the Controller.

Responsible Person Means information security department

Register of Systems Means a register of all systems or contexts in which personal data is processed by Rewot Ciro Limited.

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2. WHO WE ARE

We are Rewot Ciro Limited (“Rewot Ciro”, “we”, or “us”) with our registered office at Keekorok Building No. 30, Keekorok Road, CBD, Nairobi, Kenya. If you live in Kenya or any other country, we are the data controller responsible for your personal information when you subscribe to and access/ use any of our services available in our DCP portfolio. The services may be subscribed to/ accessed via personal contact, Rewot Ciro websites, mobile app, and via telephone.

Our Privacy Policy("Privacy Policy") helps explain our information (including correspondences) practices, including the information we process to support our Services. For example, we talk about what information we collect and how this affects you. We also explain the steps we take to protect your privacy.

This Privacy Policy applies to all Rewot Ciro Limited services unless specified otherwise.

Please also read Terms and Conditions ("Terms"), which describe the terms under which you access and use our Services.

3. INFORMATION WE COLLECT

We must receive or collect some information to operate, provide, improve, understand, customize, support, and market our Services. This also includes when you install, access, or use our Services. The types of information we receive and collect depend on how you use our Services.

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In addition we may collect, store and use following information about you while you access your DCP account with us through the mobile app or any other electronic devices:

- Buyers i.d
- First name
- Middle name
- Last name
- MPIN - Storing in base64 encoded format.
- CIF Number
- Password - Storing in base64 encoded format.
- WLDevice ID
- Device model
- Device OS version
- Device OS Type
- Last login success date
- First activated date
- Last reactivated date

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- Establishing A Future Together -

Please note, however, that in certain circumstances it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other legal bases described below is applicable.

4. INFORMATION YOU PROVIDE

a) Your Contact and Financial Data

You provide your basic information (including a profile name) to create an account. You provide us, all in accordance with applicable laws. You may provide us an email address and your account name. You may also add other information to your account, such as a profile picture and about information.

b) Your Use of Our Payments Services

If you use our payment services available in your country, we process purchase and transaction information as described in the applicable payments Terms and Conditions.

c) Customer Support (Communication Data)

You may provide us with information related to your use of our Services, including copies of your messages, and how to contact you so we can provide you with customer support. For example, you may send us an email with information relating to our services performance or other issues.

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d) Personal Contact Details

You may provide us with your biometrics (fingerprints), personal contact details such as name, title, addresses, telephone numbers, and personal email addresses, Date of birth, Gender, Employment status and salary, Marital status and dependants, Financial information, Pay records, Location of employment or workplace, Copies of driving licences or other IDs like passports.

e) Third Party Information

Information we obtain from third parties, such as information that we obtain when verifying details supplied by you and information collected from publicly available sources such as Companies House. Such third parties may include fraud prevention agencies, banks, merchants and credit reference agencies. Other information about an individual that you or they disclose to us when communicating with us, CCTV footage and other information obtained through electronic means, Photographs, IP addresses, Cookies.

5. AUTOMATICALLY COLLECTED INFORMATION

a) Usage and Log Information

We collect information about your activity on our Services, like service-related, diagnostic, and performance information. This includes information about your activity (including how you use our Services, your Services settings, how you interact with others using our Services, as well as the time, frequency, and duration of your activities and interactions while using our Services), log files, and diagnostic, crash, website, and performance logs and reports. This also includes information about when you registered to use our Services, the features you use like our messaging, calling, Status, or groups features, profile photo, about information.

b) Device and Connection Information

We collect device and connection-specific information when you install, access, or use our Services. This includes information like hardware model, operating system information, app version, browser information, connection information including phone number, mobile operator or ISP, language, time zone, IP, device operations information, and identifiers like device identifiers (including identifiers unique to Rewot Ciro Limited and it's subsidiaries' products associated with the same device or account).

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c) Location Information

We collect device location information if you use our location features, like when you choose to share your location with your contacts, view locations nearby or those others have shared with you, and the like, and for diagnostics and troubleshooting purposes such as if you are having trouble with our app's location features. We use various technologies to determine location, including IP, GPS, Bluetooth signals, and information about nearby Wi-Fi access points, beacons, and cell towers.

d) Cookies

We use cookies to operate and provide our services, including to provide our Services that are web-based, improve your experiences, understand how our Services are being used, and customize our Services. For example, we use cookies to provide Rewot Ciro for web and desktop and other web-based services. We may also use cookies to understand which of our Frequently Asked Questions (FAQs) are most popular and to show you relevant content related to our Services. Additionally, we may use cookies to remember your choices, like your language preferences, to provide a safer experience, and otherwise to customize our Services for you.

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REWOT CIRO LIMITED
- Establishing A Future Together -

6. THIRD-PARTY INFORMATION

a) Information Others Provide About You

We receive information about you from other users and businesses. For example, when other users or businesses you know use our Services, they may provide your account number, name, and other information (like information from their mobile address book or in the case of businesses, additional information about you such as unique identifiers), just as you may provide theirs. We require each of these users and businesses to have lawful rights to collect, use, and share your information before providing any information to us.

b) Businesses on Rewot Ciro Limited

Businesses you interact with using Our Services provide us information about their interactions with you. A service on Rewot Ciro may also use another company to authenticate our users, assist it in storing, reading, and responding to your messages on behalf of and in support of that business. Please note that when businesses use third-party services, their own terms and privacy policies will govern your use of those services and their use of your information on those services.

c) Third-Party Service Providers

We work with third-party service providers and the "Rewot Ciro Limited" to help us operate, provide, improve, understand, customize, support, and market our Services. For example, we work with companies to distribute our apps, provide our infrastructure, delivery, and other systems, supply location, map, and places information, process payments, help us understand how people use our Services, market our Services, help you connect with businesses using our Services, conduct surveys and research for us, and help with customer service. These companies may provide us information about you in certain circumstances; for example, app stores may provide us reports to help us diagnose and fix service issues.

d) Third-Party Services

We allow you to use our Services in connection with third-party services and Rewot Ciro Limited's Products. If you use our Services with such third-party services or Rewot Ciro Limited Products, we may receive information about you from them. For example, if you use the share button on a news service to share a news article with groups, or broadcast lists on our Services, or if you choose to access our Services through a mobile carrier's or device provider's promotion of our Services. Please note that when you use third- party services or Rewot Ciro Limited Products, their own Terms and Privacy Policies will govern those services.

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7. HOW WE USE INFORMATION

We use the information we have (subject to choices you make) to operate, provide, improve, understand, customize, support, and market our Services. Here's how:

a) Our Services

We use the information we have to operate and provide our Services, including providing customer support, and improving, fixing, and customizing our Services. We understand how people use our Services and analyze and use the information we have to evaluate and improve our Services, research, develop, and test new services and features, and conduct troubleshooting activities. We also use your information to respond to you when you contact us.

b) Safety and Security

We verify accounts and activity, and promote safety and security on and off our Services, such as by investigating suspicious activity or violations of our Terms, and to ensure our Services are being used legally.

c) Communications about Our Services and the Rewot Ciro Limited

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We use the information we have to communicate with you about our Services and features and let you know about our terms and policies and other important updates. We may provide you marketing for our Services and those of the Rewot Ciro Limited.

d) No Third-Party Banner Ads

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We still do not allow third-party banner ads on our Services. We have no intention to introduce them, but if we ever do, we will update this policy.

e) Commercial Messaging

We will allow you and third parties, like businesses, to communicate with each other using Our Services , such as through order, transaction, and appointment information, delivery and shipping notifications, product and service updates, and marketing. For example, you may receive flight status information for upcoming travel, a receipt for something you purchased, or a notification when a delivery will be made. Messages you may receive containing marketing could include an offer for something that might interest you. We do not want you to have a spammy experience; as with all of your messages, you can manage these communications, and we will honor the choices you make.

f) Measurement, Analytics, and Other Business Services

We help businesses who use Our Rewot Ciro Limited measure the effectiveness and distribution of their services and messages, and understand how people inter
act with them on our Services.

g) Information You and We Share

You share your information as you use and communicate through our Services, and we share your information to help us operate, provide, improve, understand, customize, support, and market our Services.

h) Send Your Information to Those You Choose To Communicate With

- Any member of our company, which means our subsidiaries, our ultimate holding company and its subsidiaries.
- Our business partners, suppliers and sub-contractors for the performance of any contract we enter into with you.
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. (We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users)
- Our agents
- Government and enforcement agencies and
- Credit and other payment card companies and screening companies.

i) Account Information

Your phone number, profile information, and receipts may be available to anyone who is in a company and uses our Services, although you can configure your Services settings to manage certain information available to other users and businesses with whom you communicate.

j) Your Contacts and Others

Users and businesses with whom you communicate may store or re-share your information (including your phone number or messages) with others on and off our Services. You can use your Services settings and the block feature in our Services to manage the users of our Services with whom you communicate and certain information you share.

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k) Businesses on Rewot Ciro Limited

We help businesses who use Our Services measure the effectiveness and distribution of their services and messages, and understand how people interact with them on our Services.

l) Third-Party Service Providers

We work with third-party service providers and the Rewot Ciro Limited to help us operate, provide, improve, understand, customize, support, and market our Services. When we share information with third-party service providers and the Rewot Ciro in this capacity, we require them to use your information on our behalf in accordance with our instructions and terms.

m) Third-Party Services

When you use third-party services or Rewot Ciro Products that are integrated with our Services, they may receive information about what you share with them. For example, if you use a data backup service integrated with our Services (like iCloud or Google Drive), they will receive information you share with them. If you interact with a third- party service linked through our Services, you may be providing information directly to such third party. Please note that when you use third-party services or Rewot Ciro Limited Products, their own terms and privacy policies will govern your use of those services. Below is further use and information table:-

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- Establishing A Future Together -

How we use your information	Legal basis

REWOT CIRO LIMITED
- Establishing A Future Together -

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To provide and manage your account(s) and our relationship with you	• Where necessary for the performance of our agreement or to take steps to enter into an agreement with you • Where the law requires this • Where it's in our legitimate interests to ensure that our customer accounts are well-managed, so that our customers are provided with a high standard of service, to protect our business interests and the interests of our customers
To give you statements and other information about your account or our relationship	• Where necessary for the performance of our agreement or to take steps to enter into an agreement with you • Where the law requires this
To handle enquiries and complaints	• Where necessary for the performance of our agreement or to take steps to enter into an agreement with you • Where the law requires this • Where it's in our legitimate interests to ensure that complaints are investigated, for example, so that our customers receive a high standard of service and so that we can prevent complaints from occurring in future • In the case of sensitive information, such as medical information, where you have agreed
	•
To provide our services to you	• Where necessary for the performance of our agreement or to take steps to enter into an agreement with you • Where the law requires this

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- Establishing A Future Together -

For assessment, testing (including systems tests) and analysis (including credit and/ or behaviour scoring), statistical, market and product analysis and market research. [We may use this information to prepare statistical reports to be shared internally or with our group companies. We compile these reports from information about you and our other customers. The information in these reports is never personal and you will never be identifiable from them].	• Where the law requires this • Where it's in our legitimate interests to develop, build, implement and run business models and systems which protect our business interests and provide our customers with a high standard of service
To evaluate, develop and improve our services to you and other customers	• Where it's in our legitimate interests continually to evaluate, develop or improve our products as well as the experiences ofusers of our sites, so that our customers areprovided with a high standard of service
To protect our business interests and to develop our business strategies	• Where it's in our legitimate interests to protect our people, business and property and to develop our strategies • Where necessary for the performance of our agreement or to take steps to enter into an agreement with you • Where the law requires this • In the case of sensitive information, such as medical information, where you have agreed •
To contact you, by post, phone, text, email and other digital methods. This may be: • to help you manage your accounts • to meet our regulatory obligations • to keep you informed about products and services you hold with us and to send you information about products or services • (including those of other companies) which may be of interest to you.	• Where the law requires this • Where we have agreed to contact you in our agreement • Where the law requires this • Where you agree • Where it's in our legitimate interests to share information with our customers about • products / services that may be relevant and beneficial to them. Where we send you marketing messages, you can always tell us

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	when you no longer wish to receive them. Please see more information in the Contact Us section
To collect any debts owing to us	• Where it's in our legitimate interests to collect any debts owing to us • In the case of sensitive information, such as medical information, where you have agreed
To meet our regulatory compliance and reporting obligations and to prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes. We may record your image on CCTV when you visit our premises.	• Where the law requires this • Where it's in our legitimate interests to prevent and investigate fraud, money laundering and other crimes • Where such processing is a contractual requirement of the services or financing you have requested
To assess any application you make, including carrying out fraud, money laundering, identity, sanctions screening and any other regulatory checks.	• Where you have made data public • Where such actions are in our legitimate interests, for the protection of our business interests • Where the law requires this • In the case of sensitive information, such as medical information, where you have agreed
To monitor, record and analyse any communications between you and us, including phone calls	• Where it's in our legitimate interests, to check your instructions to us, to prevent and detect fraud and other crime, to analyse, assess and improve our services to customers, and for training, for the enhancement of our customer service provision and protection of our business interests • In the case of sensitive information, such as medical information, where you have agreed

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To share your information with our partners and service providers

- Where necessary for the performance of our agreement
- Where we have a legitimate interest in using third parties to provide some services for usor on our behalf

8. **AUTOMATED DECISION MAKING**

If you apply to us for a product, your application may be processed by an automated decision- making process which may carry out credit and affordability assessment checks to determine whether your application will be accepted. Where these automated processes suggest that your application should be rejected, we will manually review your application before making a final decision. We may also use automated processes to decide credit limits.

We may also carry out automated anti-money laundering and sanctions checks. This means that we may automatically decide that you pose a fraud or money laundering risk if the processing reveals your behaviour to be consistent with that of known fraudsters or money launderers, is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity.

If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk: (i) we may refuse to provide the services you have requested, or we may stop providing existing services to you; and (ii) a record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services or employment to you.

If you have any questions about this, please contact us on the details set out below.

9. INFORMATION SHARING

We keep all your personal data confidential. However, in order to be able to service your needs to the best of our ability, we may share any information you provide to us with our company and their agents, counterparties and support service or data providers, wherever located. If you have provided information to other members of our company, those entities may also share that information with us. We will ensure that if we share such information with third parties, any such disclosure is at all times in compliance with Data Protection Legislation.

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- Establishing A Future Together -

To help us provide services, your data will be processed internally and externally by other third parties. We use third parties for [administrative, servicing, monitoring and storage of your data]. We will outsource some services to third parties whom we consider capable of performing the required processing activities so that there is no reduction in the service standard provided to you by us.

The recipients or categories of recipients, of your information may be:

- Any revenue service or tax authority including to HMRC, if obliged to do so under applicable regulations. For Common Reporting Standards and FATCA, we may also have to report your account(s) to the necessary tax authorities.
- K and overseas regulators and authorities in connection with their duties (such as crime prevention).
- Anyone to whom we may transfer our rights and/or obligations;
- Any other person or organisation after a restructure, sale or acquisition, as long as that person uses your information for the same purposes as it was originally given to us or used by us (or both).

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REWOT CIRO LIMITED
- Establishing A Future Together -

- Credit reference, identity and address verification organisations who may record and use your information and disclose it to other lenders, financial services organizations and insurers. Your information may be used by those third parties to make assessments in relation to your creditworthiness for debt tracing.
- Fraud prevention agencies and law enforcement agencies who will use it to prevent fraud and money-laundering and to verify your identity if false or inaccurate information is provided by you and fraud is identified. We, fraud prevention agencies and law enforcement agencies may access and use your information for example, when:
- Checking details on applications for credit and credit related or other facilities;
- Managing credit and credit related accounts or facilities;
- Recovering debt;
- Checking details on proposals and claims for all types of insurance.

Fraud prevention agencies can hold your personal data for different periods of time. If they're concerned about a possible fraud or money laundering risk, your data can be held by them for up to six years or as required by law.

10. RETENTION AND DISPOSAL OF DATA AND OUTPUT

We will only keep the information we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate and up-to-date and still required.

We will normally destroy or erase data after statutory timelines lapse. However, we may retain your information, or information relating to your account after you cease to be a customer for longer than this, provided it is necessary for a legal, regulatory, fraud prevention or other legitimate business purpose.

11. ASSIGNMENT, CHANGE OF CONTROL, AND TRANSFER

All of our rights and obligations under our Privacy Policy are freely assignable by us to any of our affiliates, in connection with a merger, acquisition, restructuring, or sale of assets, or by operation of law or otherwise, and we may transfer your information to any of our affiliates, successor entities, or new owner.

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12. HOW THE GENERAL DATA PROTECTION REGULATION AND DATA PROTECTION ACT, 2019 (laws of Kenya) APPLIES TO OUR CUSTOMERS

a) Our Legal Bases For Processing Information

We collect, use and share the information we have as described above:

- as necessary to fulfill our Terms;
- consistent with your consent, which you can revoke at any time;
- as necessary to comply with our legal obligations;
- occasionally to protect your vital interests, or those of others;
- as necessary in the public interest; and

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- as necessary for our (or others') legitimate interests, including our interests in providing an innovative, relevant, safe, and profitable service to our users and partners, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data.

13. HOW YOU EXERCISE YOUR RIGHTS

REWOT CIRO LIMITED
- Establishing A Future Together -

Under the General Data Protection Regulation or other applicable local laws, you have the right to access, rectify, port, and erase your information, as well as the right to restrict and object to certain processing of your information. This includes the right to object to our processing of your information for direct marketing and the right to object to our processing of your information where we are performing a task in the public interest or pursuing our legitimate interests or those of a third party. You can access or port your information using our in-app Request Account Info feature (available under Settings > Account). You can access tools to rectify, update, and erase your information directly in-app as described in the Managing and Deleting Your Information section. If we process your information based on our legitimate interests or those of a third party, or in the public interest, you can object to this processing, and

we will cease processing your information, unless the processing is based on compelling legitimate grounds or is needed for legal reasons. You can also object to our processing of your information and learn more about your options for restricting the way we use your information by visiting http://www.rewotciro.co.ke/privacy. Where we use your information for direct marketing for our own Services, you can always object and opt out of future marketing messages using the unsubscribe link in such communications.

14. MANAGING AND DELETING YOUR INFORMATION

We store information until it is no longer necessary to provide our services, or until your account is deleted, whichever comes first. All information you provide to us is stored on our secure servers. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized 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.

REWOT CIRO LIMITED
- Establishing A Future Together -

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

Length of data retention is a case-by-case determination that depends on things like the nature of the information, why it is collected and processed, and relevant legal or operational retention needs.

15. LAW AND PROTECTION

We collect, use, preserve, and share your information if we have a good-faith belief that it is reasonably necessary to: (a) respond pursuant to applicable law or regulations, to legal process, or to government requests; (b) enforce our Terms and any other applicable terms and policies, including for investigations of potential violations; (c) detect, investigate, prevent, and address fraud and other illegal activity, security, or technical issues; or (d) protect the rights, property, and safety of our users, Rewot Ciro Limited , or others, including to prevent death or imminent bodily harm.

16. OUR GLOBAL OPERATIONS

Rewot Ciro Limited shares information globally, both internally within the Rewot Ciro Limited, and externally with our partners and with those you communicate around the world in accordance with this Privacy Policy. Information controlled by Rewot Ciro Limited will be transferred or transmitted to, or stored and processed, in the Republic of Kenya or other

countries outside of where you live for the purposes as described in this Privacy Policy. These data transfers are necessary to provide the Services set forth in our Terms and globally to operate and provide our Services to you.

If the other jurisdiction does not have the same level of protection for personal data, where we process the data, we shall put in place appropriate safeguards e.g. contractual commitments to ensure the data is adequately protected.

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data.

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Where third parties are based in other jurisdictions, their processing of your personal data will involve a transfer of data to other jurisdictions.

Rewot Ciro Limited shares information globally, both internally within the Rewot Ciro Limited, and externally with businesses, service providers, and partners and with those you communicate with around the world. Your information may, for example, be transferred or transmitted to, or stored and processed in the United States or other countries outside of where you live for the purposes as described in this Privacy Policy.

17. UPDATES TO OUR POLICY

We will notify you before we make changes to this Privacy Policy and give you the opportunity to review the revised Privacy Policy before you choose to continue using our Services.

REWOT CIRO LIMITED
Establishing A Future Together -

18. CONTACT INFORMATION

If you are in the Kenya region;

The Data Protection Officer for Rewot Ciro Limited can be contacted at info@rewotciro.co.ke. If you have questions about our Privacy Policy, please contact us or write us here:

Rewot Ciro Limited

Keekorok Building No. 30 Keekorok Road Road, CBD

Nairobi, Kenya

P.O. Box 15073-00400

You have the right to lodge a complaint with Rewot Ciro Limited.

19. HOW WE PROCESS YOUR INFORMATION

Under European law, companies must have a legal basis to process data. You have particular rights available to you depending on which legal basis we use, and we've explained these below. You should know that no matter what legal basis applies, you always have the right to request access to, rectification of, and erasure of your data under the General Data Protection Regulation (the "GDPR") and Data Protection Act, 2019 (Kenyan laws) as modified and amended from time to time.

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For all people who have legal capacity to enter into an enforceable contract, we process data as necessary to perform our contracts with you (the Terms of Service, the "Terms"). We describe the contractual services for which this data processing is necessary in Our Services section of the Terms and in the additional informational resources accessible from our Terms. The core data uses necessary to provide our contractual services are:

- To provide, improve, customize, and support our Services as described in "Our Services";
- To promote safety and security;
- To transfer, transmit, store, or process your data outside the EEA, KENYA including to within the United States and other countries; and
- To communicate with you, for example, on Service-related issues.
- We'll use the data we have to provide these services; if you choose not to provide certain data, the quality of your experience using Rewot Ciro Limited may be impacted.
- When we process data you provide to us as necessary to perform our contracts with you, you have the right to port it under the GDPR and the Data Protection Act. To exercise your rights, visit How You Exercise Your Rights section of the Privacy Policy.

The other legal bases we rely on in certain instances when processing your data are:

a) Your Consent:

For collecting and using information you allow us to receive through the device-based settings when you enable them (such as access to your GPS location, camera, or photos), so we can provide the features and services described when you enable the settings.

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When we process data you provide to us based on your consent, you have the right to withdraw your consent at any time and to port that data you provide to us, under the GDPR and Data Protection Act. To exercise your rights, visit your device-based settings, your in app- based settings like your in-app location control, and the How You Exercise Your Rights section of the Privacy Policy.

b) Our legitimate interests or the legitimate interests of a third party, where not outweighed by your interests or fundamental rights and freedoms ("legitimate interests"):

For people under the age of majority (under 18, in most EU countries and Kenya) who have a limited ability to enter into an enforceable contract only, we may be unable to process personal data on the grounds of contractual necessity. Nevertheless, when such a person uses our Services, it is in our legitimate interests:

- To provide, improve, customize, and support our Services as described in Our Services;
- To promote safety and security; and
- To communicate with you, for example, on Service-related issues.

c) The legitimate interests we rely on for this processing are:

- To create, provide, support, and maintain innovative Services and features that enable people under the age of majority to express themselves, communicate, discover, and engage with information and businesses relevant to their interests, build community, and utilize tools and features that promote their well-being;
- To secure our platform and network, verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, and keep our Services and all of the Equity Group and it's Subsidiaries Products free of harmful or inappropriate content, and investigate suspicious activity or violations of our terms or policies and to protect the safety of

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people under the age of majority, including to prevent exploitation or other harms to which such individuals may be particularly vulnerable.

d) For all people, including those under the age of majority:

For providing measurement, analytics, and other business services where we are processing data as a controller. The legitimate interests we rely on for this processing are:

- To provide accurate and reliable reporting to businesses and other partners, to ensure accurate pricing and statistics on performance, and to demonstrate the value our partners realise using our Services; and
- In the interests of businesses and other partners to help them understand their customers and improve their businesses, validate our pricing models, and evaluate the effectiveness and distribution of their services and messages, and understand how people interact with them on our Services.

e) For providing marketing communications to you. The legitimate interests we rely on for this processing are:

- To promote Rewot Ciro Limited and its Subsidiaries Products and issue direct marketing.
- To share information with others including law enforcement and to respond to legal requests. See our Privacy Policy under Law and Protection for more information. The legitimate interests we rely on for this processing are:
- To prevent and address fraud, unauthorized use of the Rewot Ciro Limited Products, violations of our terms and policies, or other harmful or illegal activity; to protect ourselves (including our rights, property or Products), our users or others, including as part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm.
- To share information with the Rewot Ciro Limited to promote safety and security. The legitimate interests we rely on for this processing are:
- To secure systems and fight spam, threats, abuse, or infringement activities and promote safety and security across the Rewot Ciro Limited Products. You have the right to object to, and seek restriction of, such processing; to exercise your rights, visit How You Exercise Your Rights section of the Privacy Policy. We will consider several factors when assessing an objection including: our users' reasonable expectations; the benefits and risks to you, us, other users, or third parties; and other available means to achieve the same purpose that may be less invasive and do not require disproportional effort. Your objection will be upheld, and we will cease processing your information, unless the processing is based on compelling legitimate grounds or is needed for legal reasons.

If you are under the age of majority in your country and have a limited ability to enter an enforceable contract, we will take particular account of the fact that you are below the age of majority and adjust our assessment of our legitimate interests and the balancing of your interests and rights accordingly.

f) Compliance with a legal obligation:

For processing data when the law requires it, including, for example, if there is a valid legal request for certain data.

g) Protection of your vital interests or those of another person:

The vital interests we rely on for this processing include protection of your life or physical integrity or that of others, and we rely on it to combat harmful conduct and promote safety and security, for example, when we are investigating reports of harmful conduct or when someone needs help.

h) Tasks carried out in the public interest:

For undertaking research and to promote safety and security, as described in more detail in our Privacy Policy under How We Use Information, where this is necessary in the public interest as laid down by European Union law or Member State law to which we are subject.

When we process your data as necessary for a task carried out in the public interest, you have the right to object to, and seek restriction of, our processing. In evaluating an objection, we'll evaluate several factors, including: reasonable user expectations; the benefits and risks to you and third parties; and other available means to achieve the same purpose that may be less invasive and do not require disproportional effort.

If your objection will be upheld, and we will cease processing your information, unless the processing is based on compelling legitimate grounds or is needed for legal reasons.

20. INTELLECTUAL PROPERTY POLICY: YOUR COPYRIGHTS AND TRADEMARKS

Rewot Ciro Limited ("Rewot Ciro," "our," "we," or "us") is committed to helping people and organizations protect their intellectual property rights. Our users agree to our Terms of Service ("Terms") by installing, accessing, or using our apps, services, features, software, or website (together, "Services"). Our Terms do not allow our users to violate someone else's intellectual property rights when using our Services, including their copyrights and trademarks.

As explained in more detail in our Privacy Policy, we do not retain our users' messages in the ordinary course of providing our Services. We do, however, host our users' account information, including our users' profile picture, profile name, or status message, if they decide to include them as part of their account information.

21.1 Copyright

To report copyright infringement and request that Rewot Ciro Limited remove any infringing content it is hosting (such as a F user's profile picture, profile name, or status message on our Service), please email a completed copyright infringement claim to

info@rewotciro.co.ke (including all of the information listed below). You can also mail a complete copyright infringement claim to Rewot Ciro Limited's:

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Rewot Ciro Limited

Attn: Legal Counsel

Keekorok Buiding NO.30 Keekorok Road, CBD

Nairobi, Kenya

P.O. Box 15073 - 00400

Before you report a claim of copyright infringement, you may want to send a message to the relevant Rewot Ciro Limited user you believe may be infringing your copyright. You may be able to resolve the issue without contacting Rewot Ciro Limited.

21.2 Trademark

To report trademark infringement and request that Rewot Ciro Limited remove any infringing content it is hosting, please email a complete trademark infringement claim to info@rewotciro.co.ke (including all of the information listed below).

Before you report a claim of trademark infringement, you may want to send a message to the relevant Rewot Ciro Limited user you believe may be infringing your trademark. You may be able to resolve the issue without contacting Rewot Ciro Limited.

What to include in your copyright or trademark infringement claim to Rewot Ciro Limited

Please include all of the following information when reporting a copyright or trademark infringement claim to Rewot Ciro Limited:

+254 715 464 554
P.O. BOX 15073 - 00400
Nairobi, KENYA
info@rewotciro.co.ke
www.rewotciro.co.ke

Your complete contact information (full name, mailing address, and phone number). Note that we regularly provide your contact information, including your name and email address (if provided), the name of your organization or client who owns the rights in question, and the content of your report to the person whose content you are reporting. You may wish to provide a professional or business email address where you can be reached.

A description of the copyrighted work or trademark that you claim has been infringed.

A description of the content hosted on our Services that you claim infringes your copyright or trademark.

Information reasonably sufficient to permit us to locate the material on our Services. The easiest way to do this is by providing us the phone number/user name of the individual who has submitted the infringing content on our Services.

A declaration that:

You have a good faith belief that use of the copyrighted or trademarked content described above, in the manner you have complained of, is not authorized by the copyright or trademark owner, its agent, or the law;

The information in your claim is accurate; and

You declare, under penalty of perjury, that you are the owner or authorized to act on behalf of the owner of an exclusive copyright or trademark that is allegedly infringed.

Your electronic signature or physical signature.

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21. COOKIES

22.1 About cookies

A cookie is a small text file that a website you visit asks your browser to store on your computer or mobile device.

22.2 How we use cookies

We use cookies to understand, secure, operate, and provide our Services. For example, we use cookies:

- To provide Rewot Ciro Limited for web and desktop and other Services that are web-based, improve your experiences, understand how our Services are being used, and customize our Services;
- To understand which of our FAQs are most popular and to show you relevant content related to our Services;
- To remember your choices, such as your language preferences, and otherwise to customize our Services for you; and
- To rank the FAQs on our website based on popularity, understand mobile versus desktop users of our web-based Services, or understand popularity and effectiveness of certain of our web pages.

22.3 How to control cookies

You can follow the instructions provided by your browser or device (usually located under "Settings" or "Preferences") to modify your cookie settings. Please note that if you set your browser or device to disable cookies, certain of our Services may not function properly.

22. DETAILS OF DATA TRANSFERS OUTSIDE THE EEA AND KENYA

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www.rewotciro.co.ke

Information about you in our possession may be transferred to other countries outside the European Economic Area and Kenya (particularly to our parent company in Kenya) for any of the purposes described in this Privacy Notice.

You and they understand and accept that these countries may have differing (and potentially less stringent) laws relating to the degree of confidentiality afforded to the information it holds and that such information can become subject to the laws and disclosure requirements of such countries, including disclosure to governmental bodies, regulatory agencies and private persons, as a result of applicable governmental or regulatory inquiry, court order or other similar process. In addition, a number of countries have agreements with other countries providing for exchange of information for law enforcement, tax and other purposes.

When we, or our permitted third parties, transfer information outside the European Economic Area and Kenya, we or they will impose contractual obligations on the recipients of that data to protect such information to the standard required in the European Economic Area and Kenya . We or they may require the recipient to subscribe to international frameworks intended to enable secure data sharing. In the case of transfers by us, we may also transfer your information where the transfer is to a country deemed to provide adequate protection of your information by the European Commission or Data Commissioner or you have consented to the transfer.

If we transfer your information outside the European Economic Area and Kenya in other circumstances (for example because we have to provide such information by law), we will use best endeavours to put in place appropriate safeguards to ensure that your information remains adequately protected.

23. DISCLAIMER

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these web- sites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites

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