

## CAPSA WEBSITE PRIVACY POLICY

CAPSA Technology Limited ("CAPSA", 'us', 'we') is committed to ensuring that you are fully informed about how information collected through CAPSA's website (the "Website") is processed and/or used by us. This privacy policy ("Privacy Policy") describes such collection and usage. Any undefined capitalized terms used within this Privacy Policy will have the same meaning as they do in the Terms of Use, User T&Cs and Internal policies of our Website (the "Terms").

By using this Website, you agree to the terms of this Privacy Policy. It is CAPSA's policy to respect the privacy of visitors and users of its Website. We invite you to read the following information carefully so that you fully understand the care with which we intend to treat your personal information (as defined below). If you do not agree to this Privacy Policy, please do not continue to use the Website. When we post changes to this Privacy Policy, we will revise the version date at the bottom of the Privacy Policy. If we make a change to this Privacy Policy that we believe materially reduce your rights, we will provide a notice prior to the change becoming effective. CAPSA encourages you to read through this Privacy Policy each time you visit the Website; especially before you provide any personally identifiable information.

### Collection of Information

Please note that the scope of this Privacy Policy is limited only to information collected by CAPSA through your use of its Website. Some information may be automatically collected when you interact with our Website. The type of information that may be automatically collected is limited to non-personal information, which includes your session durations, the content you accessed on the Website, the frequency and scope of your use of the Website and information about your computer and internet connection including the operating system used and browser type.

Information from which you can be personally identified may also be collected, including but not limited to your name, email address and location of the computer through which you accessed the Website (hereinafter: "Personal Information"). Personal Information shall be collected only if received voluntarily from you, including, without limitation, by contacting us via our Website or subscribing to receive ours or other third-party Material via our authorized channels. By sharing Person Information with CAPSA, you consent to our processing of such information for the purposes disclosed herein.

Personal Information collected in the course of the provision of our Services, shall be collected pursuant to this privacy policy, the Website Terms of Use and the User T&Cs as required to facilitate Services provided to the Users. For the avoidance of doubt, the User shall assure that any Personal Information provided to CAPSA in relation to the provision of the Services, shall not violate the provisions of any applicable law or contractual obligation to which the User is bound. In particular, when such applicable law or contractual obligation requires the User to obtain consent from a third party for the collection of Personal Information, or provide a notification on the transfer of Personal Information to CAPSA, the User shall do so and shall bear sole responsibility for complying or failure to comply with such requirements and shall fully indemnify CAPSA against any claims, actions, suits, damages, costs or expenses that the User may suffer in tort, contract or negligence howsoever arising due to the use of the Website, breach of the Terms, Privacy policy and/or its own willful or negligent acts.

When you visit our Website, you might be providing information in the following ways:

- a. Statistics collected as You Browse Our Website.
- b. Organizational and Personal Information knowingly provided to us, such as your visited pages, location, domains from which you found a link to our page and Information about browsers & devices used to visit our Website.

### **Contact Us**

You may contact us through our Website via our 'Contact' section, or alternatively, by sending us an email. We will at that point of contact, collect your email address, and any additional information which you may choose to share with us.

### **Resources**

You may subscribe to any of our external Materials by providing us with your name and email address where so required on the Website.

### **Your IP Address and Host Name**

Our Website logs host names (or IP addresses when the host name is not available) for system administration and security purposes. These logs are monitored and analyzed to maintain systems and information security and to allow us to constantly improve the quality and value of our web content.

You are not required by law to provide us with any of the above information; however, if you do not provide certain information, you may not be able to use the Website in its entirety or you may be restricted from using some of our Website features or functionalities.

### **Use of Information**

We use the Personal Information collected from you for a range of different business purposes. Subject to different legal basis for processing, we may use or process your Personal Information for one or more of the underlisted purposes (applying simultaneously).

1. Providing the Requested Services
  - a. We collect Personal Information to provide you with the Services requested, to meet mandatory E- KYC requirements applicable to the nature of our business.
  - b. Such collection of information will enable us to provide you with technical and professional assistance as relates to the Services you use or intend to use.

We process the Personal Information where it is necessary for the efficient performance of the requested Service(s).

2. Improvement and Development of the Services
  - a. We collect Personal Information to develop and improve our Services, to assess feedback on the quality or efficiency of CAPSA's Services and to help provide easier and more efficient access to our Services for your use.
  - b. We collect Personal Information for ongoing review and improvement of our content and our interface (to ensure enhanced user experience).
  - c. We collect Personal Information to improve the management and administration of our business and ensure compliance with our internal policies and procedures.

d. We conduct surveys and researches, test features in development, analyze the information collected to evaluate and improve our Services and the Website, develop new features, and conduct audits and troubleshooting activities.

We process all information collected in view of our legitimate interest in achieving continuous improvement of our Website and Services.

### 3. Maintain a Safe and Secure Environment

We may use your information to detect and prevent fraud, abuse and security incidents in the following ways;

- a. Verify and authenticate your identity and prevent unauthorized or illegal activity;
- b. Enhance the safety and security of our Website and Services;
- c. Conduct security investigations and risk assessments;
- d. Prevent or take action against activities that are, or may be, in breach of our Terms or applicable law.

We process this information in light of our legitimate interest in improving our Website and Services and enabling our users to browse in a secure environment.

### 4. Personalize Content, Advertising and Marketing

If you have used CAPSA's Services in the past, we match the data we collect with other data procured from you previously to enable us to understand your needs and interests, optimize the content we send to you and making more suitable and relevant to your needs. It also enables us to improve your experience on the Website by providing you with personalized content, recommendations, and features.

We process this information in light of our legitimate interest to personalize your experience and customize our content.

### **Disclosure of Information and Transfer of Data**

Except as otherwise provided in this Privacy Policy, we reasonably attempt to ensure that we never intentionally disclose any of your Personal Information, to any third party without having received your permission, except as provided for herein or otherwise as permitted or required under law.

In order to perform our contractual and other legal responsibilities or purposes, we may, from time to time, need to share your Personal Information with third parties. We may as well share your Personal Information with our affiliates, subsidiaries or any third-party service providers to facilitate our provision of the Services or any portion thereof, such as marketing, data management or maintenance Services. We may also share your information with analytics service providers for analytics Services. Such analytics service providers set their own cookies or other identifiers on your computer, through which they can collect information about your usage of our Website. This helps us compile aggregated statistics about the effectiveness of our Website and Services.

The above mentioned third parties (together "Authorized Third Parties" may be located in countries other than your own, and we may send them information we receive. When such Authorized Third Parties process your Personal Information on our behalf, we will make reasonable efforts to ensure that they comply with obligations similar to those which are set forth in this Privacy Policy. We will also assure that they will abide by our data protection laws and security requirements and will be

allowed to use the Personal Information solely for the purposes we set out by Us. We will transfer your Personal Information while using appropriate and suitable safeguards and a variety of legal mechanisms, including contracts, to ensure your rights and protections travel with your data.

We may also transfer your information, including Personal Information, in connection with a corporate merger, consolidation, the sale of related assets or corporate division or other fundamental corporate changes. Furthermore, information about you may also be released in order to comply with any valid legal obligation or inquiry or process such as a search warrant, subpoena, statute or court order. We will also release specific information in special cases, such as if you use the Website to perform an unlawful act or omission or take any act or omission that may damage CAPSA, its property and goodwill, or if there is an attempted breach of the security of the Website or Services or a physical or property threat to you or others, or breach of contractual obligations to other users to support any judicial enforcement/action against you. The authority supervising such activities is the **National Information Technology Development Agency (NITDA)**, and you have the right to file a complaint to it or any other relevant supervisory authority.

### **Your Rights**

You have the right at any time to request to access or modify your information with Us. Generally, with regard to information collected on our website, CAPSA is a "Data Controller". Therefore, if you wish to exercise the above mentioned right, please contact us, and we will make our best efforts to fulfill your request. To exercise these options, please contact us at [support@getcapsa.com](mailto:support@getcapsa.com) or call our certified Data Protection Officer on +234-704-627-2950

### **Cookies**

We may use "cookies" and/or other technologies or files (collectively, "cookies") to identify how visitors make use of this Website. This aggregated tracking information may be used to help us improve and enhance the Website experience for all of our visitors. In addition, cookies are used for adjusting the Website to your personal preferences. Cookies contain information such as the pages you visited, the length of time you stayed on the Website, the location from which you accessed the Website and more. If you would prefer not to have cookies stored on your computer, you may modify your browser settings to reject most cookies, or manually remove cookies that have been placed on your computer. However, by rejecting the cookies, you may be unable to enjoy the full functionalities of this Website.

### **Opt In or Opt Out**

You are always in control of your data, and if you choose to receive information from Us, our affiliates or Authorized Third Parties, or others, you can change your mind later. If, at any time, you would like to stop receiving such information or opt out of a feature, you may notify us by writing to [support@getcapsa.com](mailto:support@getcapsa.com). You should be aware, however, that it is not always possible to completely remove or modify information in our databases and servers, although we will always make reasonable efforts to do so upon your request.

### **Links to Other Websites**

This Website may provide links to other websites. Please be aware that these websites are not covered by our Privacy Policy. This Privacy Policy does not cover the information practices exercised by other providers of products or Services, advertisers or other websites, companies or individuals, which are not owned or controlled by CAPSA. We recommend when linking to another website, that

you should take time to read the website's privacy policy before volunteering any Personal Information.

### **Information Security**

CAPSA considers information security to be a top priority and is committed to protecting the security of your Personal Information. CAPSA implements systems, applications and procedures to secure Personal Information, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information, in particular where the processing involves the transmission of data over a network, and against all other unlawful forms of processing. When we transmit highly confidential data over the internet, we protect it through the use of encryption. However, these measures are unable to provide absolute assurance. Personal Information collected by CAPSA may be stored and processed in a various locations (also using cloud services), which are chosen in order to operate efficiently, to improve performance, and to create redundancies in order to protect the data in the event of an outage or other problem. We take steps to ensure that the data we collect under this Privacy Policy is processed according to the provisions of this Privacy Policy and the requirements of applicable law wherever the data is located and secured against all foreseeable hazards and breaches such as theft, cyberattack, viral attack, dissemination, manipulations of any kind, damage by rain, fire or exposure to other natural elements.

Although CAPSA takes great efforts to protect your Personal Information, CAPSA cannot guarantee and you cannot reasonably expect that CAPSA's databases will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

### **Data Retention**

Generally, CAPSA does not retain information longer than necessary to provide its Services to Users and for its reasonable business and lawful needs. If you withdraw your consent to us processing your data, we will erase your Personal Information from our systems and inform you likewise of such erasure, unless the data is required for CAPSA to establish, exercise or defend against legal claims or it is necessary for the performance of any requested Services.

### **Children's Privacy**

The Website is not intended for children under the age of 18. We do not, knowingly or intentionally, collect information about children who are under 18 years of age.

### **Questions Regarding Our Privacy Policy**

If you have any questions regarding this Privacy Policy or the practices described above, you are always welcome to contact us at [support@getcapsa.com](mailto:support@getcapsa.com)

### **Governing Law and Jurisdiction**

This Privacy Policy will be governed and interpreted pursuant to the Laws of the Federal Republic of Nigeria. You expressly agree that the exclusive jurisdiction for any claim or action arising out of or relating to this Privacy Policy shall be to the competent courts of Nigeria to the exclusion of any other jurisdiction.

This page was updated on June 2021