

## **FAVVII PRIVACY POLICY**

When you use our services, such as making Beed requests for products so that you can be able to get vendors who deal in such products, or create an Account with us, you share information with us, and with persons on our platform.

As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

### **Our Privacy Policy explains:**

The type of information we collect and why we collect it.

How we make use of that information.

The choices we offer, including how to access and update information.

### **Information we collect**

We collect information to provide better services to all of our users, these information can range from contact details, to more technical information like IP Addresses.

We collect information either directly from you, when you fill a form on any of our services, or automatically when you make use of any of our services.

Information you give us. For example, when signing up for a Favvii Account. When you do, we'll ask for personal information, like your name, email address, telephone number, physical address.

Information we get from your use of our services. We collect information about the services that you use and how you use them, like when you create a Beed, like a post on our Feed Page, or you view and interact with our ads and content. This information includes:

#### **Device information**

We collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information including phone number).

## Log information

When you use our services or view content provided through our platform, we automatically collect and store certain information in server logs. This includes:

details of how you used our service, such as your Beed Requests.

chat information as you chat with vendors or users on the platform.

Internet protocol address.

device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.

cookies that may uniquely identify your browser or your Favvii Account.

## Location information

When you use our services, we may collect and process information about your actual location. We use various technologies to determine location, including IP address, GPS, and other third party integrations that may provide us with information on your location.

## Surveys

We may request that you complete a survey to allow us have a better understanding of our services and to improve them. We may also collect information about the way you use our services, and your experiences with it. By participating in any survey, you consent to our collection and the use of any information you provide in accordance with this privacy notice.

## Third Party Technologies

To carry out our services better, we may include or offer third party products or services on our platform. These third party services have their own separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked third parties.

## How we use information we collect

We use the information we collect from all of our services to provide, maintain, protect and improve them, to develop new ones, and to protect Favvii and our users. We also use this information to offer you better service.

We may use the name you provide for your Favvii Profile across all of the services we offer that require a Favvii Account.

If you have a Favvii Account, we may display your Profile name, Profile photo, and actions you take on your Favvii Account such as Beeds you create, Feed Posts you like, and Vendors you mark as favorite.

When you contact Favvii, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, to improve your user experience and the overall quality of our services.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Information you share publicly

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines such as Google. Our services will provide you with options on sharing and removing your content.

### **Accessing and updating your personal information**

Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

### **How we share information**

Favvii will not share personal information with companies, organizations and individuals outside of Favvii and other third parties. However, we may disclose your information:

For really important business processes to related bodies corporate, business partners and service providers or vendors we engage such as customer service providers, to help us provide our Services or conduct data processing on our behalf. These entities may be located and operate overseas. Except where an exception under the Nigerian Data Protection Regulation Legislation applies;

subject to any limitations in your information permission and settings, we may share your information for our everyday business purposes, such as processing payments, processing Beed requests;

with your consent and direction or as otherwise required by law.

Favvii will comply with its obligations under the relevant privacy law in relation to any such disclosures, including using reasonable commercial efforts to ensure that such third parties will only use your personal information as reasonably required for the purpose of disclosure and in a manner consistent with the privacy legislation. For example, (where commercially practicable) by including suitable privacy and confidentiality clauses in our agreement with those third parties.

We will share personal information with companies, organizations or individuals outside of Favvii if we believe in good faith, and for good reason that such disclosure of the information is reasonably necessary to:

meet any applicable law, regulation, legal process or enforceable governmental request.

enforce applicable Terms of Service, including investigation of potential violations.

detect, prevent, or otherwise address fraud, security or technical issues.

protect against harm to the rights, property or safety of Favvii, our users or the public as required or permitted by law.

We may however share aggregated, non-personally identifiable information publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services.

If Favvii is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

### **Information security**

We work hard to protect Favvii and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

We try to encrypt some of our services using SSL.

We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.

We restrict access to personal information to Favvii employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

### **When this Privacy Policy applies**

Our Privacy Policy applies to all of the services offered by Favvii, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not cover the information practices of other companies and organizations who may advertise or conduct business on our services, and who may use cookies, digital tags and other technologies to offer their ads.

### **Compliance and cooperation with regulatory authorities**

We regularly review our compliance with our Privacy Policy. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We will work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

### **Changes**

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes).

**Disclaimer**

Favvii has no prior relationship or representation with vendors or customers who carry out business on the platform. We are solely responsible for facilitating your transactions with vendors on the platform, by creating the enabling platform for your interactions through our technical expertise. We are not responsible for any lapse in handling your private information that occurs as a result of their wrongful actions.

**Retention Period**

Subject to the provisions of the NDPR 2019, the retention period of personal information of users of Favvii shall be as follows:

Five (5) years after the last active use of our digital platform;

Upon presentation of evidence of death by a deceased's relative, personal information of such User would be discarded;

Immediately upon request by the User of Favvii or his/her legal guardian where: no statutory provision states otherwise and; where such User is not the subject of an investigation or suit that may require retention of the personal information sought to be deleted.

**Governing Law**

This privacy policy is made pursuant to the Nigeria Data Protection Regulation 2019 and other relevant Nigerian laws, regulations, or international conventions applicable to Nigeria. Where any provision of this Notice is deemed inconsistent with a law, regulation or convention, such provision shall be subject to the overriding law, regulation or convention.

This privacy notice applies to any User of the Services provided by Favvii, and to anyone else who contacts Favvii or otherwise submits information to Favvii.