

# PRIVACY POLICY

Softblue Nigeria Limited ("Fash Creatives", "we", "us", "our") provides a platform for its fashion stylist and designers to manage their fashion business. At Fash Creatives, one of our core values is transparency and we owe you ("User") a duty to tell you how we handle your personal information. Personal information are unique information or aggregated data which when processed with other information can identify you as a living human being and business. We recommend you read this privacy notice ("Notice") carefully to understand your rights and our duties towards managing your personal data in addition to our Terms of Use. If you have any questions about either of these documents, please send us an email at [hello@trymima.com](mailto:hello@trymima.com).

## 2. Document version control

This Notice is subject to change and consequential review based on legislative changes, need or in response to changes in our working arrangements. Any changes to this Notice will be approved by the authorized officers.

## 3. Why we need your personal information

We primarily collect information about you to enable us to:

- 3.1. provide Fash Creatives Services;
- 3.2. inform you of different product offerings;
- 3.3. comply with our legal and regulatory obligations;
- 3.4. develop, improve, enhance, modify, add to and further develop our services;
- 3.5. verify you, your identity, that the data provided is credible and prevent fraud;
- 3.6. provide customer support to you;
- 3.7. enable the detection or prevention of fraud and for your protection; and
- 3.8. For any other purpose with your consent.

#### **4. Consent**

We primarily collect information about you to enable us to:

You accept this privacy notice when you click on the “signup” button to opt-in and use our Platforms, use our Services, features, technologies, or functions offered on our website, digital platforms or visit any of our offices for official or non-official purposes. If you otherwise decide to opt out, you can do so by reaching out to us on [hello@trymima.com](mailto:hello@trymima.com). This privacy notice governs the use of the Fash Creatives Services and if you are not comfortable with us processing your data, you may not use our Services.

#### **5. How we collect your personal information**

We collect information directly from you as well as automatically through your use of our Services, and in some cases, from third-parties subject to your authorisation.

When you fill out a form, participate in a contest or promotion, request customer service, or otherwise communicate with us we need your information to understand your needs and to provide relevant services to you.

We may also receive information about you from other sources and combine that information with the information we collect directly. Examples of information we may receive from other sources include: updated delivery or payment information used to correct our records, purchase or redemption information, as well as customer support and enrollment information.

#### **6. What personal information do we collect about you**

We collect only the information essential for you to create an account with Fash Creatives and use our Services.

The information we collect includes:

6.1. your personal information in relation to your account such as your name, business name, logo, website address, business address, business registration number, social media handles, location, email address(es) and mobile contact number. We may also collect the name, location, phone number and other information about third parties related to you or their use of our services if you provide that information to us;

6.2. details relating to when and where you request our Services and the details of any orders made or received by you in relation to our Services, including your geographical location (which may be calculated from information collected in (8.3) of this section below);

6.3. details of the device on which any of our Platforms or application has been installed or accessed on, which may include your operating system and versions, unique device identifiers, serial numbers, mobile network and Wi-Fi information;

6.4. personal information collected and held via financial or third-party payment systems about the payment mechanism or method that you might use (including credit card details) and the payments you may make for our services or other goods or services you request or receive that are related to the services we provide;

6.5. your connection to other individuals whose personal information we may collect or hold, for example family members, friends, or referrals;

6.6. details about your participation in any loyalty programs linked or available through us or any of our business partner or affiliate;

6.7. if you use social media to interact with us or other services provided by third parties through the Fash Creatives, any information that you allow the social media platform and/or the other third-party site to share with us;

6.8. any address that you may use, for delivery services;

6.9. if you respond to optional survey requests, demographic information including age, marriage status, ethnicity, profession and income.

## **7. How we use your personal information**

The purpose of collecting your personal information is to give you efficient, enjoyable and secure Service. We may use your information to:

7.1. provide our Services to you;

7.2. communicate with you;

7.3. notify you of any important information or content that you may be interested in;

7.4. for research and development;

7.5. ensure and enhance the safety and security of Users and relevant third parties;

7.6. for customer support services such as facilitating responses to your enquiries or complaints;

7.7. conduct customer surveys and research activities;

7.8. conduct marketing, promotions and advertising activities;

7.9. fulfill our obligations or claim our rights in legal proceedings;

7.10. facilitate communications between Users;

7.11. authenticate Users;

7.12. investigate and prevent possible fraud and illegal activity;

- 7.13. process and facilitate payment for services facilitated by us;
- 7.14. deal with disputes and complaints;
- 7.15. comply with laws, regulations and rules, including assisting government agencies and law enforcement investigations;
- 7.16. report to regulatory authorities or government bodies on regulatory compliance;
- 7.17. use or disclose it as otherwise authorized or permitted by law.
- 7.18. contact you at any time through your provided telephone number, email address or other contact.

## **8. Third party technologies**

Occasionally, at our discretion, we may include or offer third-party products or services on our Platform. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our Platform and welcome any feedback about these sites.

## **9. Location Services**

Before you can use our Platform for the first time, we will ask you to choose whether to allow Fash Creatives access your location and in what circumstances. Location services must be enabled for us to provide our Services to you. You may change these settings at any time on your device. With your permission, we will obtain your location through IP address, GPS, and other sensors that provide necessary information for the provision of our Services.

We may collect Wi-Fi metadata from your device including whether your device is Wi-Fi and GPS enabled and connected to Wi-Fi, the Media Access Control (MAC) address of your device, the Set Service Identifier (SSID) and signal level of Wi-Fi networks within the range of your device, the GPS location of your device in relation to Wi-Fi networks in the range of your device, and the time the metadata was collected. We use the information primarily so that we can recommend customers closest to you.

## **10. Communication**

Fash Creatives will record all communications (voice and text) made and received through the Fash Creatives Platform for safety, monitoring and quality assurance purposes, fraud prevention, and for analytical purposes in order to improve our services, including our customer service, policies and procedures and/or to investigate and deal with disputes and complaints. By using this functionality you consent to Fash Creatives recording and using these communications as stated in this Privacy Notice.

## **11. Your social media use**

Fash Creatives uses third-party websites such as Facebook and Twitter for interactive information sharing and to connect with Users. We recommend you to read any terms and conditions (including any privacy statements or policies) that apply to any third-party web service relating to the handling and management of your personal information as they may use your personal information in ways and for purposes that are different from the way Fash Creatives uses and processes your personal information.

We encourage you to keep your personal information confidential by contacting them through direct or private messages, email or the customer service hotline.

## **12. Surveys**

We may request that you complete a survey to allow us have a better understanding of our Services and to improve them. If you choose to participate in any optional survey, we may collect demographic information about you, including age, marriage status, ethnicity, profession and income, and which could include your sensitive information. 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 use of the information you provide in accordance with this privacy notice.

## **13. Disclosures of your personal information**

13.1. Fash Creatives will not sell or rent your information to third parties. However, we may disclose your information:

- for any of the reasons outlined in section 7 above and related purposes which would be reasonably expected by you;
- 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 your orders and delivery purposes;
- with your consent and direction or as otherwise required by law.

13.2. Fash Creatives 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 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.

13.3. Your privacy and information permissions and settings can be updated at any time on the Fash Creatives mobile application when you are logged into your account.

## **14. Disclaimer**

Fash Creatives has no prior relationship or representation with the fashion stylist whose directory services are listed on Fash Creatives's Platform. Fash Creatives is solely responsible for the purchase of customer's order and the delivery of the order to the customer's provided address upon confirmation of payment.

Fash Creatives will not be responsible for any breach in the representations made by the fashion stylist concerning any order made by you and does not guarantee that the representations will be true and accurate.

## **15. Storage and Security**

We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, and unauthorized access.

personal information we collect on servers in electronic databases which are located in Ireland and managed by our related entities and/or service providers.

We have put in place suitable physical, electronic administrative procedures and measures to safeguard and protect the information about you that we collect, and to reduce the risks of loss, misuse, disclosure, alteration and unauthorized access to your personal information within our custody. Personal information and associated data stored on servers is encrypted and is stored through data isolation technology. We limit access to personal information to individuals within our employ or that of our related entities or contracted service providers who we believe reasonably need access to such information to provide products or services to you, or to us, or in order to perform their duties. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. To prevent unauthorized access to your information, we have implemented strong controls and security safeguards at the technical and operational levels. Our website uses Secure Sockets Layer (SSL) to ensure secure transmission of your Personal Data. You should see the padlock symbol in your URL address bar when browsing through our website. The URL address will also start with https:// depicting a secure webpage. SSL applies encryption between two points such as your PC and the connecting server. Any data transmitted during the session will be encrypted before transmission and decrypted at the receiving end. This is to ensure that data cannot be read during transmission.

## **16. Retention period**

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

16.1. five (5) years after the last active use of our digital platform;

16.2. upon presentation of evidence of death by a deceased relative, personal information of such User would be discarded;

16.3. immediately upon request by the User of Fash Creatives or his/her legal guardian where:

- no statutory provision states otherwise and
- such User is not the subject of an investigation or suit that may require retention of the personal information sought to be deleted.

## **17. Direct marketing**

We may occasionally contact you directly with related orders, information, and special offers from us and other businesses. You consent to us sending you such information including by means of telemarketing, email, SMS and other digital channels when you "Subscribe" to receive marketing communications from Fash Creatives.

If at any time you decide you do not wish to receive marketing communications from us, you may click the "Unsubscribe" button in the marketing emails and messages or by emailing us. If you opt out of receiving marketing communications from us, we may still contact you or send you messages that are not of promotional nature, such as receipts for delivery services booked through Fash Creatives.

## **18. Links to other websites**

Fash Creatives and communications sent by us may contain links to websites or web addresses of third parties and third-party services. While we take appropriate care when publishing links to any third-party services, you shall, at your own discretion, decide whether or not to access such links or accept such services. Fash Creatives gives no undertakings or warranties with respect to the accuracy, completeness, adequacy and reliability of any information, data, opinions, pictures, statements or suggestions provided by such links. Fash Creatives does not have control over or assumes any liability for third party websites, their content or their data use and retention policies or practice.

## **19. Information about your personal information**

19.1. You may make any of the following requests in respect of your personal information within our custody:

- confirmation that we hold and use personal information about you;
- access to the personal information we hold about you provided that such requests are made in compliance with the Freedom of Information Act and other relevant enactments;
- correction of or updates to the personal information we hold about you;
- anonymisation, blocking or erasure of your personal information that is no longer necessary in order for us to provide services to you or no longer necessary for our normal business operations and activities;
- data portability. In some circumstances, you may, by express request ask us to provide a third-party service provider with a copy of the personal information we hold about you in a structured, machine-readable and commonly used format (as selected by us), or otherwise in accordance with the requirements of the applicable law;
- deletion or erasure of personal information we hold about you, where we relied on your consent to use your personal information unless an exception applies, such as where we are required to retain such information to comply with our legal or regulatory obligations as set out in section 16.3.1;
- to the extent not addressed in section 14, information regarding third parties to whom your personal information is disclosed;
- revoke your consent, where we rely on your consent to use and disclose your personal information;

19.2. You can make any of the above requests by contacting us. We may ask you to complete a form and provide suitable identification when you seek to make any of these requests, in order to verify your identity.

19.3. We will provide you with a response as soon as possible. Requests that we deem simple, will be responded to within 2-3 days, while those we deem to be more complicated may take up to 20 working days to respond to. If we are unable to comply with your request for any reason (such as, not being permitted or required to do such an act under the privacy legislation in force) we will inform you of this.

19.4. If the personal information we provide in response to your request includes information that is the personal information of a third party, or that is confidential, or in which we own copyright (such as transcripts or recordings of customer service call records), we may redact such information where reasonably necessary, and you must keep such information confidential and not make the information public, including by sharing the information on social media, without our written consent sought and obtained.

19.5. Users can also delete their account from the Fash Creatives. If you delete your account, we will retain your personal information in accordance with our record keeping policies and obligations as an online customer directory and delivery services facilitator (as applicable).

19.6. Fash Creatives may retain your personal information after you have requested us to delete or de-identify your information if:

- there is an unresolved issue relating to your account, such as an outstanding credit on your account or an unresolved claim or dispute;
- we are required to by any applicable law; and/or
- necessary for our legitimate business interests, such as fraud prevention and enhancing users' safety and security.

19.7. When personal information is no longer required, we will take reasonable steps to delete the personal information from our systems or de-identify the personal information.

## **20. Changes to our privacy notice**

From time to time and for any reason, we may revise and update our privacy Notice and our information handling practices. Our Privacy Notice is available in the Fash Creatives mobile application and website.

If we make significant changes to our privacy Notice, we will notify you of the changes through the Fash Creatives application or by other means, such as email. We may also amend this privacy Notice at any time by posting a revised version on our website or mobile application. The revised version will be effective 7 days after publication.

We encourage you to review this Privacy Notice regularly to ensure you are familiar with any changes.

## **21. Governing law**

This privacy notice 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 Fash Creatives, and to anyone else who contacts Fash Creatives or otherwise submits information to Fash Creatives.