

# **SPOTTER'S PRIVACY POLICY**

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## **1.0. ABOUT OUR PRIVACY POLICY**

**Please read this Privacy Policy carefully as it provides information on how SpottR collects, uses, processes, discloses and protects your personal data/information (including non-public information) when you visit our website(s) or use our mobile application(s).**

SpottR is committed to protecting the privacy of our site visitors and mobile application users. We understand the importance of keeping personal data confidential and have provided this privacy policy which applies to information we collect when you use our website(s) and mobile application(s) (collectively, "Services") or otherwise interact with us as described below. We keep our privacy policy under regular review and may change or alter it from time to time. If we make changes, we may notify you by revising the date at the top of this policy, or in some cases, we may provide you with additional notice (such as by adding a statement to the homepages of our website or mobile application or by sending you an email notification).

We encourage you to review our privacy policy whenever you interact with us to stay informed about our data/information protection practices and the ways you can help protect your privacy.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes at any time while you continue to use our services.

## **2.0. DATA PROTECTION OFFICER**

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO via email at [hello@theSpottRapp.com](mailto:hello@theSpottRapp.com)

## **3.0. CONTROLLER**

SpottR (also referred to as "we", "us" or "our" in this privacy policy) is the controller and is responsible for your personal information on our website(s) and mobile application(s).

## **4.0. THE INFORMATION WE COLLECT**

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

4.1. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

a. Non-public Personal Information

We collect nonpublic personal information you provide to us when you register to create a SpottR User Account or when you communicate with us about your SpottR User Account. The personal information we may collect include but is not limited to

- i. identity data such as your first name, maiden name, last name, title, marital status, gender, date of birth;
- ii. contact data such as your address, phone number, email address;
- iii. transaction data such as your bank account information and other information about your transactions with us;
- iv. profile data such as your username, password, next of kin details, your interests, preferences, feedback and survey responses;
- v. marketing and communications data such as your preferences in receiving marketing from us and our third parties (where applicable) and your communication preferences.

We may collect identity data and contact data if you request an invite to join SpottR or if you enter into any contest or promotion.

b. Your Transactional Information

As you use your SpottR account to spot opportunities and/or complete transactions, we collect nonpublic personal information in connection with each query, including time, transaction name, amount and merchant details. We may also collect photos, memos or other information that you attach to your transactions.

c. Other Information

Other information which we will automatically receive while you use our Services include

- i. usage data and log information such as information about how you use our website, products and services, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Services;
- ii. device information such as information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers and mobile network information.

iii. your location information from your mobile device with your prior consent. We have incorporated Google Maps into our Services, and you may consent to the collection of location information by Google Maps in connection with your use of this maps service. Any information collected via your use of Google Maps will be transmitted directly to Google and is not collected by us. Please refer to Google's privacy policy for details about their collection, use and sharing of this information. For information about how to disable the collection of location information from your device, please see "**Your Choices**" below.

4.2. We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but may not essentially be considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

#### **4.3. Where you do not provide Personal Data**

If there is need for us to collect personal data by law, or under the terms of this Privacy Policy, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our Services). In this case, we may have to cancel a Service you have with us but we will notify you if this is the case at the time.

## **5.0. HOW WE COLLECT PERSONAL INFORMATION**

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

### **a. Direct interactions:**

You may give us your [Identity, Contact and Financial Information] by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal information you provide when you

- i. apply for our products or services;
- ii. create an account on our website or mobile application;
- iii. subscribe to our Services or publications;
- iv. request marketing to be sent to you;
- v. enter a competition, promotion or survey; or
- vi. give us feedback or contact us.

**b. Automated technologies:**

As you use our Services, we will automatically collect Technical Data such as log information, location and information about your device.

**c. Cookies and other tracking technologies:**

i. Cookies are small data files stored on your hard drive or in your device memory that help us to improve our Services and your experience, see which areas and features of our Services are popular and count visits. We collect information automatically by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. To collect information, we may send cookies to your computer or mobile device. For more information about cookies, and how to disable them, please see “Your Choices” below. We may also collect information using web beacons (also known as "tracking pixels"). Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon.

ii. How We Respond to “Do Not Track” Signals:

We allow Do Not Track browser configurations, using cookies and other tracking technologies. Do Not Track status may alter the available services with certain browsers when these tracking functionalities are used to provide services. We do not alter the information our applications attempt to collect based on your Do Not Track configuration.

**d. Third parties or publicly available sources:** We work closely with various third parties (including financial service providers, security agencies, analytics providers, advertising networks, search information providers, data brokers or aggregators etc) and receive personal information about you from them. We will notify you when we receive information about you from third parties or public sources and the purposes for which we intend to use such information.

We may receive Technical information from the following parties:

- i. Google Play Services
- ii. AdMob
- iii. Fabric
- iv. Firebase Analytics
- v. Crashlytics
- vi. Adjust

- vii. Facebook

## **6.0. HOW WE USE INFORMATION**

**6.1.** We process and use information only on legal grounds such as

a. performance of our contract with you

b. necessary compliance with a legal obligation

c. our legitimate interests including to keep our records updated and to study how you use our Services; to develop our Services and grow our business; to inform our marketing strategy; to provide administration, IT services and network security; to prevent fraud; to recover debts due to us. Set out below is a description of how we use your personal information, including non-public personal information:

- i. to provide, maintain and improve our Services
- ii. to provide and deliver the products and services you request, process transactions and send you related information, including confirmations
- iii. to verify your identity and prevent fraud
- iv. to send you technical notices, updates, security alerts and support and administrative messages
- v. to communicate with you about products, services, offers, promotions, rewards, and events offered by SpottR and others, and provide news and information we think will be of interest to you
- vi. to monitor and analyze trends, usage and activities in connection with our Services
- vii. to personalize and improve the Services and provide advertisements, content or features that match user profiles or interests
- viii. to process and deliver contest or promotion entries and rewards
- ix. to link or combine with information we get from others to help understand your needs and provide you with better service
- x. to carry out any other purpose for which the information was collected.

6.2. SpottR is based in Nigeria and the information we collect is governed by the Nigerian law. By accessing or using the Services or otherwise providing information to us, you consent to the processing and transfer of information in and to Nigeria and other countries.

## **7.0. YOUR CHOICES**

a. Account Information

You may edit your account profile information by logging into your account via our Services. If you wish to delete or deactivate your online account, please contact us via [hello@theSpottRapp.com](mailto:hello@theSpottRapp.com), but note that we may retain certain information as required by law or for legitimate business purposes.

b. Promotional Communication

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Also, we may use your Identity, Contact, Technical, Usage and Profile Information to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you and we send you promotional messages based on the relevant information. However, you may opt out of receiving promotional emails or text messages from SpottR by following the instructions in those messages. Please note that if you opt out, we may still send you transactional or relationship messages, such as those about your account or our ongoing business relations.

c. Location Information

If you initially consent to the collection of location information by SpottR or Google Maps within our mobile application, you may be able to subsequently stop this collection through your device operating system settings or through your online account settings. If either of these opt-out options are not available to you, you may also disable location information by following the standard uninstall process to remove our mobile application from your device.

d. Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies or to alert you when websites set or access cookies. Please note that your choice to remove or reject cookies (where you choose to) could affect the availability and functionality of our Services.

e. Social Sharing Features

Our Services include social sharing features for common social networks to let users share content. These features are served from third-party services that may serve their own cookies. The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope

of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

f. Analytics and Advertising Services Provided by Others

We may allow others to provide analytics services on our behalf and to serve advertisements on our behalf across the Internet. These entities may use cookies, web beacons and other technologies to collect information about your use of the Services and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by SpottR and others, to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising targeted to your interests and better understand your online activity.

g. Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

h. Opting out

You can ask us or third parties to stop sending you marketing/advertising messages at any time by visiting the relevant website following the instructions on how to adjust your marketing/advertising preferences. Where you opt out of receiving these marketing/advertising messages, this will not apply to personal information provided to us as a result of a Service we provide.

## **8.0. CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get more information as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will inform you of the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **9.0. DISCLOSURE OF INFORMATION**

9.1. We may disclose any information we collect about current and former customers, including nonpublic personal information, to affiliates and non-affiliated third parties as follows:

- a. to financial service providers, including the financial institutions identified in your cardholder bank agreement that provide banking services in connection with your SpottR account.
- b. to another User, when you sign up for SpottR's services via a referral link. The User that referred you may receive information indicating that you have enrolled with SpottR. You may avoid this sharing by not using a referral link to enroll.
- c. to non-financial companies, such as email service providers that perform marketing services on our behalf, and fraud prevention service providers that use the information to provide services to SpottR and other companies.
- d. to a non-affiliated third-party to access and transmit your personal and financial information from a relevant financial institution. You grant the third-party the right, power, and authority to access and transmit this information according to terms of their privacy policy.
- e. to other non-affiliated companies for our everyday business purposes, such as to process transactions, maintain accounts, respond to court orders and legal investigations or report to credit bureaus. For example, in connection with our everyday business purposes, we may share information about you as follows:
  - i. in response to a request for information, if we are required by, or we believe disclosure is in accordance with any applicable law, regulation or legal process.
  - ii. with relevant law enforcement officials or other third parties, such as investigators or auditors, if we believe it is appropriate to investigate fraud.
  - iii. in connection with, or during negotiations of any merger, sale of SpottR's assets, financing or acquisition of all or a portion of our business to another company; and
  - iv. with your consent or at your direction, including if we notify you that the information you provide will be shared in a particular manner and you provide such information.

#### 9.2. Disclosure to third parties:

We may disclose information to third parties (whether internal or external third parties) to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy. We may also share aggregated or de-identified Information, which cannot reasonably be used to identify you. For example, we may share transaction zip codes with third parties to improve our accuracy in geo-locating opportunities and to improve the clarity of transaction descriptions. We require all third parties to respect the security of your

personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

SpottR will usually not share your personal information with other third parties without your consent. Where we need to transfer your data to another country, we will ensure that such country to which the data is being transferred already has adequate data protection law. We will seek your consent where we need to send your data to a country without an adequate data protection law.

#### **10.0. INTERNATIONAL TRANSFERS**

Many of our external third parties are based outside Nigeria so their processing of your personal information will involve a transfer of data outside Nigeria. Whenever we transfer your personal information out of Nigeria, we ensure a similar degree of protection is afforded to it. Where we use certain service providers, we may use specific contracts approved for use in Nigeria which give personal information the same protection it has in Nigeria.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of Nigeria.

#### **11.0. INFORMATION SECURITY**

SpottR takes reasonable measures to help protect all information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Additionally, SpottR implements policies designed to protect the confidentiality and security of your nonpublic personal information, including a privacy protection policy. SpottR limits access to your nonpublic personal information to employees, agents, contractors and other third parties that have a business reason to know such information, and implement security practices and procedures designed to protect the confidentiality and security of such information and prohibit unlawful disclosure of such information in accordance with its policies.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

#### **12.0. HOW LONG WE KEEP YOUR PERSONAL INFORMATION**

We will only retain your personal information for as long as reasonably necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, tax, accounting, internal policy or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information; the potential risk of harm from unauthorised use or disclosure of your personal information; the purposes for which we process your personal information and whether we can achieve those purposes through other means; and the applicable legal, regulatory, tax, accounting or other requirements. You can request for details of retention periods for different aspects of your personal information by contacting us.

### **13.0. WHERE WE STORE YOUR INFORMATION**

The information that we collect from you will be transferred to and stored at a destination outside Nigeria. By submitting your personal information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. All information you provide to us is stored on our secure cloud storage solution.

### **14.0. YOUR LEGAL RIGHTS**

Under Data Protection Laws, you have been given certain rights in respect of the information we hold about you. We have outlined some of those rights below (this is not a complete, exhaustive statement of your rights in respect of your personal information):

- a. You have a right to consent to this Privacy Policy and to withdraw your consent at any time.
- b. You have a right to a copy of the personal data/information we hold about you, as well as the information about what we do with it, who we share it with, how long we hold it for and whether we are processing it lawfully. We may make a reasonable charge for additional copies of that data in the case of unfounded and excessive requests.
- c. You have a right to request the transfer of your personal information received from us to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you
- d. You have the right to have the information we hold about you corrected, if it is incomplete or factually inaccurate, though we may need to verify the accuracy of the new data you provide to us. You may contact us for this purpose.
- e. In some circumstances (where there is no good or lawful reason for us continuing to process your information), you have the right to request erasure of the information that we hold about you. In such circumstances, you may ask us to delete or remove personal data. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have

processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- f. You have the right to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- g. You have a right to lodge a complaint about the handling of your personal information with the National Information Technology Development Agency (NITDA). NITDA's website has a wealth of useful information in respect of your rights over your personal information.
- h. You have the right to ask us not to process your personal information for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms (if applicable).
- i. You have the right to request restriction of processing of your personal information. If you choose to do so, you may ask us to suspend the processing of your personal information where
  - i. you want us to establish the accuracy of your information
  - ii. our use of the data is unlawful but you do not want us to erase it
  - iii. where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims
  - iv. you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- j. You have the right to withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise your rights, you may write to us at [hello@theSpottrapp.com](mailto:hello@theSpottrapp.com) .

## **15.0. NO FEE**

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

#### **16.0. REQUEST FOR SPECIFIC INFORMATION**

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

#### **17.0. TIME LIMIT TO RESPOND**

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