



PRIVACY POLICY

This Privacy Policy governs the manner in which Cellulant and its Affiliates collect, use, maintain and disclose information collected from users (each, a "User") of Cellulant Sites and all products and services offered by Cellulant, including the Tingga App.

1. Definitions

In this Privacy Policy, the following words shall have the meanings attached to them unless the context otherwise requires:

- **"Affiliate"** means in relation to Cellulant, a subsidiary or a holding company of Cellulant, or any subsidiary of the holding company and all of its subsidiaries;
- **"Cellulant"** means Cellulant and/or its Affiliates;
- **"Site"** means any website or application owned and/or operated by Cellulant and in respect of which this privacy policy applies;
- **"SSL"** means Secure Sockets Layer; and
- **"User"** a person who logs into the Cellulant site or downloads the Tingga application from Google Playstore

2. Types of Personal Information We Collect

We collect contact information. If you sign up for a mailing list or reach out to us using the "Contact Us" option on our website, you may be asked to provide your name, address, email, cell phone number, workplace information and/or country of birth. For registration on the Tingga application, you may be asked to provide your cell phone number.

We collect information you submit or post. We collect information that you post in a public space on the site. We also collect information when you contact us or when you apply for a job. For the Tingga Virtual Card service, we will collect information like your recent image, photograph of your national ID for identity verification.

We collect usage information. We may collect information about the browser you are using. We might look at what site you came from or what site you visit when you leave our site. If you are using an App, we may collect location information with your consent, including your precise location, if you have enabled location services in your device settings. We may also collect device identifiers.

3. Why We Collect Personal Information

What We Use Your Personal Information For	Our Reasons	Our Legitimate Interests
<p>Consumer service. We use your personal information for consumer service purposes, including responding to your enquiries. This typically requires the use of certain personal contact information and information regarding the reason for your inquiry (e.g. order status, technical issue, product question/complaint, general question, etc.).</p>	<ul style="list-style-type: none"> • Fulfilling contractual obligations • Legal obligations 	<ul style="list-style-type: none"> • Improving and developing new products and services • Being more efficient

	<ul style="list-style-type: none"> • Our legitimate interests 	
What We Use Your Personal Information For	Our Reasons	Our Legitimate Interests
<p>Contests, marketing and other promotions. With your consent, we use your personal information to provide you with information about goods or services (e.g. marketing communications or campaigns or promotions). This can be done via means such as email, ads, SMS, phone calls and postal mailings to the extent permitted by applicable laws. Some of our campaigns and promotions are run on third party websites and/or social networks. This use of your personal information is voluntary, which means that you can oppose or withdraw your consent to the processing of your personal information for this purpose. For more information about our contests and other promotions, please see the official rules posted with each contest/promotion.</p>	<ul style="list-style-type: none"> • Contests, marketing and other promotions • Fulfilling contractual obligations • Our legitimate interests 	<ul style="list-style-type: none"> • Working out which of our products and services may interest you and telling you about them • Defining types of consumers for new products or services

4. Non-Personal Identification Information

We may collect non-personal identification information about Users whenever they interact with our Site. Non-personal identification information includes (but is not limited to) the browser name, the type of computer, means of connection to our Site, such as the operating system and the internet service providers utilized.

5. Web Browser Cookies

Cookies are text files placed on Your computer to collect standard internet log information and visitor behavior information. When you visit our sites, we may collect information from you automatically through cookies or similar technology.

How do we use cookies?

We use cookies in a range of ways to improve Your experience on our site, including:

- Keeping You signed in
- Understanding how You use our website or app
- Used to maintain the security of the website.
- Used to distinguish between humans and bots.
- Used to determine the optimal video quality based on the visitor's device and network settings.
- Registers unique ID that is used to generate statistical data on how the visitor uses the website.
- Used by Google Analytics
- Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.



- Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.
- Used by Google AdWords to re-engage visitors that are likely to convert to customers based on the visitor's online behaviour across websites.

What type of cookies do we use?

There are a number of different types of cookies, however, we use:

- **Functionality** – we use these cookies so that we recognize You on our site and remember Your previously selected preferences. These could include what language You prefer and location You are in. a mix of first-party and third-party cookies are used
- **Advertising** – we use these cookies to collect information about Your visit to our site, the content You viewed, the links You followed and information about Your browser, device and Your IP address. We sometimes share some limited aspects of this data with third parties for advertising purposes. We may also share online data collected through cookies with our advertising partners. This means that when You visit another website, You may be shown advertising based on Your browsing patterns on our site

How to manage cookies

You can set Your browser to not accept cookies. However, in some cases, some of our website features may not function as a result.

6. How the Personal Information is Used

Due Diligence. We may use the personal information to carry out due diligence or “Know-Your-Customer” checks as required by law.

Provide, Improve and Develop the Site. We may use the personal information to provide, improve and develop the Site such as to:

- Enable you to access and use the Site
- Enable you to communicate with other Users
- Operate, protect, improve and optimize the Site and experience, such as by performing analytics and conducting research
- Provide customer service
- Send you service or support messages, updates, security alerts and account notifications
- If you provide us with your contacts' information, we may process this information:
 - (i) to facilitate your referral invitations;
 - (ii) to send your requests for references;
 - (iii) for fraud detection and prevention; and
 - (iv) for any purpose you authorize at the time of collection
- To operate, protect, improve and optimize the Site and experience, and personalize and customize your experience (such as ranking search results)
- Enable your use of our products and services

7. How We Store Your Information

We store your information based on applicable country laws which may be in the country or on the cloud as acceptable.

User data is securely stored at the Africa Data Centre in Nairobi, Kenya and AWS centres in Europe. For Tanzania users, your data is stored in Simbanet Data Centre to



comply with the county's data localisation requirement. Your data is encrypted both in transit and at rest.

Kenya User data (transaction data) is kept for a period for at least seven years as required by the Companies Act 2015, Laws of Kenya. All other countries data is retained as per applicable country laws. Once this time period has expired, we will delete User data by following the steps defined in our disposal policy.

8. How We Protect Your Information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site. Sensitive and private data exchange between the Site and its Users happens over an SSL secured communication channel and is encrypted with digital signatures.

9. Your Data Protection Rights

We would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request Us for copies of your personal data..

The right to rectification – You have the right to request that We correct any information you believe is inaccurate. You also have the right to request Us to complete information You believe is incomplete.

The right to erasure – You have the right to request that We erase Your personal data, under certain conditions.

The right to restrict processing – You have the right to request that We restrict processing of Your personal data, under certain conditions.

The right to object to processing – You have the right to object to Our processing of Your personal data, under certain conditions.

The right to data portability – You have the right to request that We transfer the data that We have collected to another organization, or directly to you, under certain conditions.

If You make a request, we have one month to respond to You. If You would like to exercise any of these rights, please contact us at privacy@cellulant.com

Call us at: +254 708802299

Or write to us: Vienna court, State House Crescent,

P. O. Box 44134-00100, Nairobi, Kenya

10. Privacy Policies of other Websites

Our website may contain links to other websites. Our privacy policy applies only to our site, so if You click on a link to another website, You should read their privacy policy.



11. Changes to this Privacy Policy

Cellulant has the discretion to change or update this Privacy Policy at any time. When such a change or update is undertaken, we shall post a notification on the main page of our Site. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications.

12. Acceptance of These Terms

By ticking the consent box, you signify your acceptance of this policy and terms of service. Your continued use of the platform following the posting of changes to this policy will be deemed your acceptance of those changes.

13. Information you can access

Examples of information you can access through Tingg App profile page:

- your name, email address, phone number, and other similar contact information;
- your purchase and payment history;
- your in-app activity such as application activity and profile activities;
- your consent records such as permissions allowed by the customer;
- your SMS and bill notification settings; and
- if you participate on the Tingg.africa website (or other similar venues operated or provided by us), your subscriptions and other information.

14. How To Opt Out Of Data Collection

If you have an account with us, you can opt out of receiving our marketing communication by modifying your preferences in the “view or change my profile” section on our app. You can also opt out by modifying your email or SMS subscriptions by clicking on the “unsubscribe” link or following the opt-out instructions included in the message. Alternatively, you can contact us using the contact details in the “Contact” section below.

15. Breach Notification

Breach notification will be carried out in accordance with Cellulant Breach Notification Policy, Procedures for handling Information Security and Privacy incidents and applicable legal, regulatory and contractual obligations.

16. Contacting us

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this Site, please contact us at:

Email: privacy@cellulant.com



Call us at +254 708802299

Or write to us: Attention: Data Protection Officer

Cellulant

Vienna court, State House Crescent

P. O. Box 44134-00100, Nairobi, Kenya