

PRIVACY POLICY

Cellulant Corporation (“*Cellulant*”, “**we**”, “**us**”, “**our**” “**Company**”), recognizes your privacy rights as guaranteed under the Data Privacy Law of your resident country (refer to Table 1 under Appendix for list of Data Privacy Laws addressed by this policy), the EU General Data Protection Regulation, and the privacy provisions in other relevant laws applicable to our businesses. Thus, it is important to us as a law-abiding organization that your Personal Data is managed, processed, and protected in accordance with the provisions of the applicable laws. In the course of our business and/or your engagement with us and third parties through our Platforms (this includes but are not limited to our websites, digital platforms, mobile applications, physical operations/offices, amongst others), we may process your Personal Data, subject however to the terms of this policy. This Privacy Policy (“*Policy*”) therefore explains our privacy practices with respect to how we process your Personal Data and describes your rights as a user of any of our services and platforms.

Data/information means any information relating to you, including your name, identification number, identification documentation, location data, online identifier address, photo, email address, pins, passwords, bank details, posts on our Platforms, religion, date of birth, health, race/tribe, nationality, ethnicity, political views, trades union membership, criminal records, medical information, and other unique identifiers such as but not limited to MAC address, IP address, International Mobile Equipment Identity (IMEI) number, Bank Verification Number, International Mobile Subscriber Identity (IMSI) number, Subscriber Identification Module (SIM) and others. It also includes factors specific to your physical, physiological, genetic, mental, economic, cultural, or social identity.

Process/Processing means any operation or set of operations which is performed on your Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

BASIS FOR DATA PROCESSING

We process data under the following lawful grounds:

Contract: We process data to ensure the fulfillment of our contractual obligations to our merchants and invariably their customers.

Legitimate Basis: We process data to mitigate risks such as fraud, anti-money laundering, counter terrorism financing, among others.

Legal Obligation: We process data to fulfill regulatory requirements.

Consent: We process personal data of consented data subjects such as our employees and customers as applicable.

CONSENT

We only ask for your personal information when we need it to provide or improve our products and services for you. We want to ensure that we have your consent to collect this personal information, and when it is necessary, we share this information with our partners that help us serve you.



We kindly request that you carefully read through this policy and click on the 'Agree' icon below or share a signed copy of this policy, if you consent to the terms of this policy, particularly with respect to the processing of your Personal Data. That notwithstanding, if you proceed to use any of our Platforms and services, it will be deemed that you have provided your express consent to the terms of this policy.

AGE

You must be at least 18 years old to use Cellulant's services or Platforms. Individuals under the age of 18, or applicable age of maturity, may utilize Cellulant services only with involvement of a parent or legal guardian, under such person's account. Regardless, all Personal Data which may be processed shall be in accordance with this policy and other applicable laws.

COLLECTION OF PERSONAL DATA

In the course of your engagement with us or with third parties through our Platforms, we may collect your Personal Data in the following ways:

- a. **Automatic information collection:** We may automatically collect information upon your engagement with us or our Platforms through your computer, mobile phones, forms, documents made available to us, other access devices like a webservice call. We also collect anonymous information through our use of cookies and web beacons to customize your experience of our Platform and to improve account security. You may decline our use of cookies, unless the same is mandatory for the use of our Platform. Please note however that refusal to permit the use of cookies may affect your use of our Platform.
- b. **Information from downloads:** When you download or use our digital Platforms, or access any of our sites, we may receive information about your location and your device, including a unique identifier. We may use this information to provide you with location-based services, such as advertisements, search results, and other personalized content. You may disable your location in the settings menu of the device or browser.
- c. **Physically or Digitally Provided information:** We may collect and process your information when you create and/or update your account on our Platform; complete forms, questionnaires, surveys etc. We may also collect information from the data you provide to us through documents, letters, e-mail, agreements, correspondence, ID cards, passports, or through any other means by which you willfully provide information to us.
- d. **Third Parties:** We may also receive your information from third parties such as relatives, guardians, regulators, financial institutions, merchants, aggregators, vendors, and service providers etc.
- e. **Social media:** We also receive information through your engagements with us on social media sites (e.g., Facebook, Instagram, LinkedIn, Twitter, and WhatsApp). This includes but is not limited to your replies to our posts, your comments, enquiries, messages to us, etc.



USING YOUR PERSONAL INFORMATION

In the course of your engagements with us or through our Platforms, we collect personal information for various legal reasons, largely to enable us to personalize your experience and to provide a more efficient service to you. Some of the reasons we collect information are to:

- a. Provide services and customer support;
- b. Process transactions, payment requests, and send notices about transactions;
- c. Create an account with us for the provision or use of our services;
- d. Verify customers' identity, including during account creation and password reset processes;
- e. Manage your account and provide you with efficient customer service;
- f. Resolve disputes, process payments and troubleshoot problems;
- g. Manage risks, or to detect, prevent, and/or remediate fraud, violation of policies and applicable user agreements or other potentially prohibited or illegal activities;
- h. Execute our contractual obligations to you;
- i. Improve our services and functionality by customizing user experience;
- j. Measure the performance of our services and improve their content and layout;
- k. Manage and protect our information technology infrastructure;
- l. Provide targeted marketing and advertising, provide service or transaction update notices, and deliver promotional offers based on communication preferences;
- m. Obtain a means by which we may contact you; either by telephone, text (SMS), email messaging, social media, etc;
- n. Conduct background checks, compare information for accuracy and verify same with third parties;
- o. Identify or address a violation and administer our policies and terms of use;
- p. Comply with legal, contractual, and regulatory obligations;
- q. Execute your specific requests or use the same for a specific purpose as you may instruct;
- r. Investigate and respond to your complaints or enquiries;
- s. Process your access to our services, Platforms, or functions from time to time;

If we intend to use any Personal information in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the personal information is required and obtain your consent.

STORAGE AND PROTECTION OF YOUR DATA

We maintain robust security measures to protect your personal information, utilizing physical, technical, and administrative protocols. These measures are designed to mitigate risks such as loss, misuse, unauthorized access, disclosure, and alteration. Sensitive data is encrypted and accessible only to authorized users. Platform access is restricted to authorized personnel, and your information is securely stored on our servers, following industry best practices and leveraging top-tier security tools and controls.

We are committed to ensuring the safety of your Personal Data by implementing necessary measures. However, it is imperative for you to also maintain the security of access codes, PINs, passwords, usernames, and any information facilitating third-party access to your accounts on our Platforms. We strongly recommend safeguarding and keeping such information confidential. If you utilize a third party's device (e.g., laptops, phones, public internet) to access your account, ensure proper logout procedures. Note that certain devices automatically save passwords or usernames, hence exercising caution is advised when using third-party devices. If you suspect unauthorized access to your information, promptly contact us.



PROCESSING YOUR INFORMATION

To fulfill our obligations to you and facilitate transactions, we may need to process your information, including your name, account number, account ID, e-wallet account, contact details, shipping and billing address, or other details essential for transaction completion. Collaborating with third parties, such as financial institutions and service providers, is essential for transaction facilitation on our Platforms. Throughout your engagement with us, we may share your information with various stakeholders, including but not limited to financial institutions, service providers, credit bureaus, collection agencies, Cellulant Group companies (including subsidiaries and affiliates), regulatory or judicial authorities, or other third parties as required by a subpoena, court order, or applicable legal process, whether within or outside your country of residence.

Additionally, we may process your information when, at our sole discretion, disclosure is deemed necessary to comply with applicable laws, judicial or regulatory orders, conduct investigations, manage existing or imminent risks, prevent fraud, crime, or financial loss, ensure public safety, report suspected illegal activities, or investigate violations of our Terms and Conditions.

In all instances, we prioritize the safety of your information and inform the receiving party about its confidential nature. We emphasize the need to maintain confidentiality and prevent unlawful or unauthorized usage of your information.

YOUR RIGHTS

You have the following rights regarding your personal information collected by us:

- a. Right to access your personal information being held by us. Requests for such information may be sent to dpo@cellulant.io.
- b. Right to request that your personal data be made available to you in an electronic format or that it should be sent to a third party (Kindly note that we have the right to decline such request if it is too frequent, unreasonable, and likely to cause substantial cost to us. In any event, we will communicate the reason for our refusal);
- c. Right to rectify any inaccurate, incomplete information. As such, if you discover any inaccuracy in your personal information, kindly notify us promptly and provide us with documentary evidence to enable us to update the requisite changes;
- d. Right to withdraw consent for the processing of your information, provided that such withdrawal shall not invalidate any processing hitherto done based on the consent previously given by you;
- e. Restrict or object to the processing of your personal data. However, we may be compelled to process your data where required under law, regulatory authorities, or court of law;
- f. Right to request that your personal data be deleted. We may however continue to retain the information where required under law, contract, regulatory authorities, or court of law.
- g. Right to data portability;
- h. Right to lodge complaints with relevant authorities;
- i. Right to information regarding the existence of automated decision-making, including profiling and meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing;



SOFTWARE

If you download or use our software, such as a stand-alone software product, an app, or a browser plugin, you agree that from time to time, the software may download and install upgrades, updates, and additional features from us in order to improve, enhance, and further develop the software.

CROSS BORDER DATA TRANSFER POLICY

Cellulant, being a multinational organization with affiliates and partners situated across various regions globally, may need to transfer your information or data (whether electronically or otherwise) beyond the borders of your country of residence in the course of delivering our services and enhancing your experience. Nevertheless, we uphold an unwavering commitment to ethical and responsible practices to ensure the robust protection of your personal information, regardless of the location where the data is transferred or hosted.

This policy establishes our global standards for the management and safeguarding of information and data by Cellulant or on its behalf, irrespective of its country of origin or the destination to which it is transferred. The scope of this policy encompasses any information transfer undergoing processing or intended for processing after being transferred to a foreign country or international organization.

We will only engage in the transfer of information or permit its processing by third parties in different jurisdictions if the concerned country maintains an adequate level of data protection, as determined by the relevant regulatory authority. This determination will align with the provisions outlined in the prevailing Data Protection Regulation in your country or any other applicable privacy law.

In the absence of any decision by the appropriate regulatory authority as to the adequacy of safeguards in a foreign country to which your information may be transferred, we will only transfer your information to a foreign country or an international organization if any of the following requirements have been met:

- a. Your explicit consent has been obtained (Please note that such foreign countries or international organizations may have privacy laws or policies less stringent than that of your resident country. However, we will ensure that the recipient of such information undertakes to protect your information and handle it with utmost confidentiality);
- b. The transfer is necessary for the performance of a contract between you and Cellulant or the implementation of pre-contractual measures taken at your request;
- c. The transfer is necessary for the conclusion or performance of a contract concluded in your interest between Cellulant and another natural or legal person;
- d. The transfer is necessary for public interest;
- e. The transfer is necessary for the establishment, exercise, or defense of legal claims; and
- f. The transfer is necessary in order to protect your vital interests or of other persons, where you are physically or legally incapable of giving consent.

In order to ensure that any cross-border transfer of your information is adequately protected, we may:

- a. Conduct privacy due diligence to evaluate the privacy practices and risks associated with third parties in a foreign country.
- b. Obtain contractual assurances from those third parties that they will process your information

pursuant only to Cellulant's instructions, and in accordance with our Privacy Policy, and that they will notify Cellulant promptly of any Privacy Incident, including any inability to comply with the standards set forth in this policy and applicable laws, and that they will not engage another organization to process the Personal information without putting in place an agreement imposing equivalent data protection standards.

- c. Ensures that in providing your information, that we will, where necessary, ensure that it is anonymized, and we will obtain written assurances from any third parties that they will only use the information for the legal purpose for which it was provided, and in accordance with applicable laws;
- d. Where required, register the processing of your information with or seek the approval of the applicable privacy or data protection regulatory authority.
- e. Limit data retention periods for information.
- f. Disclose your information in response to lawful requests by public authorities, including to meeting national security or law enforcement requirements.

COOKIE POLICY

Cookies are small pieces of data, stored in text files, that are stored on your computer or other device when websites are loaded in a browser, and which collects information about user actions on a site.

When you access our Platforms, we may place small data files on your computer or other device. These data files may be cookies, pixel tags, flash cookies, or other local storage provided by your browser or associated applications (collectively referred to as “*cookies*”). These technologies are used to recognize users as customers; customize services, content, and advertising; measure promotional effectiveness; help ensure that account security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety on our Platform. We also use cookies to collect and use data as part of our services, recognise your browser or device, learn more about your interests, and provide you with essential features and services.

This policy applies to our websites and Platforms alone. We do not exercise control over the sites displayed or linked from within our various services. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you.

WHAT TYPE OF COOKIES DO WE USE?

Temporary cookies: This is also known as 'session cookies'; it helps our sites and platforms to recognise users, temporarily memorize their online activities and the information provided when they navigate through our website. Session cookies only retain information about your activities for as long as you are on the website. Once the web browser is closed, the cookies are automatically deleted.

Permanent cookies: This is also known as 'persistent cookies' or 'first-party cookies'; they remain in operation even after the web browser has closed. It helps our sites or platforms remember your information, preferences, and settings such as language selection and internal bookmarks for when you revisit in the future.

WHY WE USE COOKIES?

Cookies store helpful information to enhance users' experiences on our site, and possibly to improve our ability to reconnect with you later. They are used to remember you and your preferences such as your preferred language, device settings, browsing activities and other useful information, help you navigate between pages efficiently, and generally improve your experience in using our services.

The following cookies are used are as follows:

- a. **Authentication:** We use cookies and similar technologies to recognize you when you visit our site. If you sign into our website or mobile app, it helps us show you the right information and personalize your experience in line with your settings. Cookies also enable us to identify you and verify your account.
- b. **Security:** We use cookies to make your interactions with our services and platforms faster and more secure. For example, we use cookies to enable and support our security features, keep your account safe and to help us detect malicious activity and violations of our terms and conditions of use.



- c. **Preferences, features, and services:** We use cookies to enable the functionality of our Services, such as helping you to fill out forms on our Services easily and providing you with features, insights, and customized content. We also use it to remember information about your activities on our platforms and your preferences.
- d. **Performance, Analytics and Research:** Cookies help us learn more about how well our services perform in different locations. We use cookies to determine and measure performance and to learn whether you have interacted with our websites, content or emails and provide analytics based on those interactions.

WHERE WE PLACE COOKIES

We set cookies in a number of different locations across our services. These locations may include:

- a. Our websites (including www.cellulant.io and www.tingg.africa) and other Services;
- b. Our mobile applications;
- c. E-mails (We may use cookies in some of our emails to enable us to understand how you interact with our emails. It also helps us to improve our future email communications with you. Depending on your email or browser settings, cookies in our emails may be automatically accepted.)

CONTROLLING COOKIES

We will always ask for your consent to accept the use of cookies on your device. You can freely decline our cookies when you see our “accept cookies” request or through your browser settings. Cookies are optional unless they are required to prevent fraud or ensure the security of Platforms we control. You may also configure your specific browser or email settings to automatically reject cookies. You may also erase cookies stored on your device through your browser settings or by deleting the folder or file where they are stored on your device.

Declining our Cookies may affect your ability to fully utilize our Platform and services. Without cookies you may not have access to certain features on the site, including access to certain personalized content.

Cellulant may revise this Cookies Policy to reflect changes in the law, our data collection and use practices, the features of our site, or advancements in technology. If we make any material changes, we will notify you by email or through a prominent notice on our sites/platforms prior to such change.



DATA RETENTION POLICY

Introduction

This Data Retention Policy (the “Policy”) sets out how Cellulant retains records (*defined below*) necessary for its business operations, contractual obligations, legal, audit and regulatory compliance, and when we may destroy such records, whilst promoting orderly and efficient data management. This ensures compliance with the data protection laws and the duty of confidentiality to which we are bound. We retain your information for as long as necessary for the purpose(s) for which it was collected. The period of data storage and retention is subject to legal, regulatory, administrative, and operational requirements.

Records include information, data, documents (contractual, personal), correspondence, policies, confidential information, etc. regardless of media; created, received, and maintained by Cellulant as evidence, and in compliance with regulatory requirements, legal obligations, business practices, legal policies, contractual obligations, financial transactions, administrative activities, business decisions or other actions. Records provide information about, and evidence of Cellulant’s transactions, customers, employment, and activities, and may be created, received, or maintained in hard copy or electronic format.

Scope of this Policy

The main objective of this policy is to ensure that complete and accurate records are identified, retained, stored, protected, and subsequently destroyed or archived appropriately under such terms and within such periods set out in this policy.

This policy applies to all our Platforms, and all related sites, applications, services, and tools regardless of how they are accessed or used. It also covers all Records stored on company-owned, leased, and otherwise company-provided systems and media, regardless of location, including our servers, third party servers; computer systems (desktops or laptops), mobile devices, physical records stored at our offices or other locations.

Policy Administrator

Cellulant’s Data Protection Officer (DPO) shall oversee the administration, implementation, and the procedure of this policy. The DPO works with the Cellulant’s leadership team and Risk & Compliance departments to ensure that the data retention schedule (below) is followed. The DPO has the authority to review the data retention procedures; monitor compliance; make modifications to the data retention schedule when necessary to ensure it complies with the relevant laws, encompasses new developments, and contains the appropriate records and documents.

Security Measures

In addition to other existing data protection measures being implemented, Cellulant ensures that the following measures are in place to protect the security of retained records:

- a. All records received and retained through emails must be encrypted and/or password protected and will only be transmitted and stored over secure networks.
- b. All records retained physically (in hardcopy form) will be stored in a secure container, file, or

- folder, marked “confidential” and kept in a safe location.
- c. Records whether physical or electronic will be stored in secure folders and will not be left unattended.
 - d. Computer systems used to retain records will always be password protected, the hard disk encrypted, properly maintained, and protected from virus or unauthorized access.
 - e. Retained records will not be stored in the personal devices of employees.
 - f. All records stored electronically will be backed up periodically in a way to prevent permanent data loss.
 - g. All electronic copies of records will be stored securely using passwords and encryption as appropriate.
 - h. Records will be retained in a secure location, with limited access to authorized personnel only.
 - i. All passwords used to protect records will be changed periodically and must be secure.
 - j. All records retained during their specified periods will be traceable and retrievable.

Retention Period and Procedures

For all records obtained, used, and stored by Cellulant, we will conduct periodic reviews of the records retained, confirming their purpose, continued validity, accuracy, and requirement to retain such records. Records will be kept for as long as they are needed to meet the operational or contractual needs of Cellulant, together with legal and regulatory requirements. Cellulant may transfer paper-based records to an alternative media format in instances of long retention periods.

As a general principle, Cellulant will only need to retain one copy of the final version of a record. Draft documents may be destroyed immediately unless they contain vital information which were not otherwise contained in the final document.

The retention periods for records provided under this policy takes into consideration:

- a. The requirements of Cellulant for such records; the type, sensitivity, and importance of such record;
- b. Contractual obligations;
- c. The purpose of processing such record;
- d. Lawful basis for processing the records;
- e. The requirements of the law. Where it is not possible to define a statutory or legal retention period in line with the applicable data protection/privacy laws, we will identify the criteria by which the period can be determined (such as industry standards) and update this policy as may be necessary.

Records must be categorized by purpose and retained for specific periods in accordance with the Retention Schedule below. Retained records will be grouped by category and in a clear date order when the Record was stored and/or archived.

Notwithstanding the retention periods provided in the retention schedule below, records which are subject of, or required in any pending litigation, investigation or other regulatory process shall not be destroyed or altered, until the completion of such process.

Destruction of Records

Destruction of records is a critical component of this policy. Once the retention period has elapsed, the records are either reviewed, archived, returned, anonymized, or confidentially destroyed depending on their purpose, importance, and legal requirements. When a record has reached its designated



destruction date, the DPO together with data custodians shall refer to the retention register to determine the next action to be taken. Not all data or records are expected to be deleted upon expiration; sometimes it is sufficient to anonymize the data, return the record or to archive records for a further period.

Records will not be kept after the retention period unless:

- a. The record is the subject of a pending litigation, administrative or regulatory proceedings. In these circumstances, destruction will be delayed until such regulatory proceedings have been completed, at which time a new retention period will be created.
- b. The record has long-term value for Cellulant's statutory or regulatory obligations.
- c. Cellulant determines that such record will be permanently stored, provided that no legal, regulatory, or contractual breach will occur by the permanent retention of such record.
- d. There is a legal or regulatory reason or order to maintain the records either permanently or for a longer period.

Cellulant is committed to the secure and safe disposal of any record in accordance with our contractual and legal obligations. Accordingly, when the records have been retained until the end of their retention period, they can be destroyed in the following ways:

- a. Hard copies of documents will be destroyed by shredding or burning.
- b. Non-sensitive information can be thrown in a normal trash bin and properly disposed of.
- c. Electronic records will be deleted /erased and cleared from recycle bins.
- d. Electronic equipment or systems containing records will be destroyed. Where a specific record is stored in one single media such as a CD ROM and cannot be erased, such media used to store the record will be physically destroyed. However, where the media contains other records which are not due for deletion, and it is impossible to separately erase such record due for deletion, the retention period shall be extended to such period when all the records in that media are due for deletion/destruction, and Cellulant shall either format or physically destroy the media.
- e. Destruction of electronic records should render them non-recoverable even using forensic data recovery techniques.



DATA RETENTION SCHEDULE

The Retention schedule below will govern the period that records will be retained in accordance with this policy. Cellulant must comply with data protection laws, contractual or regulatory obligations which require that records must not be kept longer than is necessary for the purpose for which it was collected.

The Data Retention Schedule is organized as follows:

SN	Record Type	Minimum Retention Period
1.	Transaction records	10 years
2.	Risk Management records	2 years
3.	Compliance and Regulatory Records	5 years after termination/expiry
4.	Customer Support Interactions	1 year
5.	System Logs	1 year
6.	Intellectual Property Documents	Permanent
7.	Accounting and Financial Records	10 years
8.	Contracts and Agreements	7 years after termination/expiry
9.	Corporate Records	6 years
10.	Electronic Documents	6 years
11.	Investor and Grant Records	6 years after expiration
12.	Insurance Records	7 years
13.	Legal Files and Papers	Permanent
14.	Payroll Records	6 years
15.	Pension Documents	6 years
16.	Personnel Records	6 years
17.	Property Records	Permanent
18.	Tax Records	10 years
19.	Project Records	6 years after completion
20.	General Correspondence	10 years
21.	Corporate Policies	6 years after cancellation or expiry

SN	Record Type	Minimum Retention Period
22.	Health and Safety Records	6 years
23.	Membership Records	6 years from membership expiry
24.	Customer KYC Record	7 years after cessation of relationship



THIRD-PARTY CONTRACT & SERVICE PROVIDERS DATA POLICY

Data transfer to third parties

We may share your personal data with our service providers, financial institutions, vendors, affiliates, subsidiaries, parent company, contractors, etc. to assist Cellulant in providing, delivering, analyzing, administering, improving, and personalizing content that is delivered to you as part of our services. These include third parties who assist us in performing, delivering, or enhancing certain products and services related to the delivery and operation of our services; or who provide technical and/or customer support on our behalf; or who provide application or software development and quality assurance; or who provide verification functions, who process transactions and payment requests, research on user demographics, interests, and behavior, and other products or services. These third-party service providers may also collect personal information about or from you in performing their services and/or functions on our website or Platforms. We may also pass certain requests from you or your organization to these third-party service providers. Regardless of the third-party involved, any disclosure shall only be for a lawful purpose.

Data transfer for the purpose of legal/regulatory compliance

We may be required to share your personal data with a regulator, law enforcement body, government agency, court or other third party to:

- (i) comply with the law;
- (ii) enforce the terms of a contract; and
- (iii) protect the rights, property, or safety of Cellulant.

Links to third-party websites or services

This policy only applies to information collected by our site/Platforms or which we transfer in the course of our services to you. Our site and platforms may contain links to other websites or services that are not owned or controlled by us, including links to websites of financial or technical partners, financial institutions, vendors, advertisers, sponsors, partners, service providers, who at one point or the other facilitate transactions executed on our Platforms.

We have no control over these third-party websites, and your use of third-party websites and features are subject to the privacy policies of those websites or platforms. We are not responsible or liable for the privacy or business practices of any third-party websites linked to our site or third-party social media feature or functionality displayed on our site, including, but not limited to Facebook, LinkedIn, Twitter, etc. Your use of third-party websites linked to our sites is at your own risk, therefore, we encourage you to read the privacy policies of any linked third-party websites or platform you access through or outside our sites or platforms. If you are dissatisfied with the privacy policy or data protection standard of such third-party, you are at liberty to exit such a site/platform. Cellulant will not be responsible for any damage, loss or liability caused to you on those third-party sites or platforms.

Security of shared information

We will not share your information with any third party until we obtain an undertaking (implicit or explicit) that they will take appropriate steps to implement appropriate security measures by themselves, their employees, officers, affiliates, and sub-processors to protect your information and prevent unauthorized disclosure or loss. We will also ensure that such third parties commit themselves



to the statutory and contractual obligation of confidentiality, as may be stipulated in a non-disclosure agreement, privacy policy, confidentiality clauses, etc. We will also obtain an undertaking that such third-party will comply with the applicable data protections laws in force, and that it will under no circumstances use your information for any unlawful purpose or purpose other than that for which the information was disclosed.

Cellulant will from time-to-time monitor and review the conduct or activities of these third parties to ensure that they are compliant with the confidentiality obligations imposed on them.

EXCEPTIONS

Please note that this Privacy Policy does not apply to information that is already in the public domain through no fault of ours.

VIOLATION

If you violate the letter or spirit of this policy, or otherwise create risk or possible legal exposure for us or attempt to violate the privacy rights of Cellulant and/or its other users, we reserve to restrict your access to our Platforms. We will notify you if we are constrained to take such a decision.

DISPUTE RESOLUTION

We are dedicated to ensuring that you are satisfied with our management of your information. However, in the unlikely event that you have a complaint, please contact us via the details below, stating your name and details of your complaint. Upon receipt of your complaint, we will endeavor to contact you within (48hrs) with a view to amicably resolving such dispute within the shortest possible time. The foregoing notwithstanding, all disputes arising from this policy shall first be resolved by negotiation. However, if parties fail to resolve the disputes amicably by such mutual consultations, parties shall further attempt to resolve the dispute by mediation.

UPDATES

This Policy may be updated from time to time. Where there are changes to the Policy, we will notify you by posting a notice on our website. We also welcome you to regularly review the Policy to keep you updated on our Policy.

CONTACT US

If you have questions regarding your data privacy rights or would like to submit a related data privacy right request, kindly contact us via the information below:

OPERATIONS HEADQUARTERS

CELLULANT KENYA LIMITED
Vienna Court, State House Crescent,
West Wing, 2nd Floor,
P.O Box 44134-00100, Nairobi, Kenya.
Email: dpo@cellulant.io
Phone number: +254 720 996366

Physical addresses of our other offices can be accessed via <https://cellulant.io/contact-us/>



Please allow up to 2 days for requests to be processed. The Company reserves the right to charge a reasonable fee to process excessive or repeated requests.

AMENDMENT

We may amend or revise this policy at any time by posting a revised version on our website. Notice of the amendment shall be posted on our website and the revised version will be effective from the date of publication. Kindly, note that your continued use of our Platforms after the publication of the revised version constitutes your acceptance of our amended terms of the policy.

[AGREE] [DISAGREE]

APPENDIX**Table 1: List of Applicable Data Laws/Regulations**

SN	Data Privacy Regulation Description	Country
1	The Data Protection Act 2019 (the “Act”)	Kenya
2	Nigeria Data Protection Act 2023	Nigeria
3	The Data Protection Act 2012 (Act 843)	Ghana
4	The Protection of Personal Information Act (POPIA)	South Africa
5	Data Protection Act 2018	Botswana
6	The Data Protection Act 2021	Zambia
7	Cyber and Data Protection Act 2021	Zimbabwe
8	The Personal Data Protection and Privacy Act 2019	Uganda
9	Personal Data Protection Act 2022	Tanzania