# **HELPCENTRAL**

## **Privacy Policy**

We understand how important the privacy of personal information is to our users. This Privacy Policy will tell you what information we collect about you and about your use of Helpcentral Services. It will explain the choices you have about how your personal information is used and how we protect that information. We advise you to read this Privacy Policy carefully.

This Privacy Policy applies to www.helpcentral.ng and other websites owned and operated by us that are intended for use by consumers and including the mobile optimized versions of these sites and our Mobile Device Applications or "Apps" (we refer to these sites and Apps collectively as the "Sites"). We refer to the Sites and Apps, along with the information and services made available to you through the Sites and Apps, as the "Services."

This Privacy Policy also applies to the consumer-facing version of any Product. Except where noted, statements in this Privacy Policy with respect to the Sites also apply to the Apps. If you do not want us to collect, use or disclose information about you and your use of the Services as described in this Privacy Policy, then you should not use the Services. By using the Services, you must agree to the Terms of Use, which is the contract between us and users of the Services. By accepting the Terms of Use, you confirm that you have read and understand this Privacy Policy and our Cookie Policy and you acknowledge that we will store, use and otherwise process your information in the jurisdiction where we are located.

References to "We" or "Us" have the same meaning as defined in the Terms and Condition or Terms of Use. We may share information among our subsidiaries or websites that are owned or controlled by us, but information collected under this Privacy Policy is always protected under the terms of this Privacy Policy.

## **Information Collected About You**

Some of our Services do not retain your personal information, while others especially the App and certain of our registration-only Apps store your personal information in accordance with this Privacy Policy. Even if you do not register with or provide any personal information to Us, we collect information about your use of the Sites and Apps and the Services. We may also acquire information about our users from external sources.

When you use the Services, we collect information as follows:

#### Registration

While you may use some of the Services without registering, certain Services do require that you register with Us for them to function properly. If you choose to register or update an existing account with Us or access certain Services, you may be required to provide certain personal information, such as your name, address, telephone number, gender, email address and date of birth, and a username and password to access your account. You are responsible for ensuring the accuracy of the personal information that you submit to Us.

#### <u>Interactive Services</u>

Some of our Services are interactive and may request that you submit personal information, along with other information such as your age and gender.

## **Email Newsletters**

At registration and at various times as you use the Sites, you will be given the option of providing us with personal information in order to receive informational/promotional newsletters — via email from Us and/or directly from third parties. From time to time,we may offer users of third party websites the opportunity to subscribe to our newsletters through those websites. If you elect to subscribe to one of our newsletters on a third party website, the operator of that website will provide us with the personal information you have provided in connection with the subscription request, which we may use in accordance with this Privacy Policy as though you had provided it directly to Us.

## **Email a Friend**

If you use our Email a Friend service to tell a friend about a feature on our Site or a newsletter, we will ask you for your name, your email address and your friend's email address. We will automatically send your friend a one-time email inviting him or her to visit the site using your name and email address as the "from" email address. We do not use your friend's email information for any other purpose. We will only use the information you provide to send the requested email to your friend.

If you believe that one of your contacts has provided us with your personal information and you would like to request that it be removed from our database, please use the Contact Us link provided at the bottom of every page of the Sites.

## Market Research

From time to time, we may conduct online research surveys on behalf of ourselves and third parties through email invitations, pop-up surveys and online focus groups. When participating in a survey, we may require you to provide your location, age and if there's a sweepstakes associated with the market research survey, your name and contact information for purposes of sweepstakes administration. The information you submit in a survey may be used by us for research and measurement purposes, as described below, including to measure the effectiveness of content, advertising or programmes. The personal information you provide in connection with a sweepstakes entry will be used for the sole purpose of administering the sweepstakes and as required by applicable law. We will not knowingly invite individuals who are under the age of 18 to participate in market research surveys.

#### Emails You Send to Us

This Privacy Policy does not apply to information, content, business information, ideas, concepts or inventions that you send to us by email. If you want to keep content or business information, ideas, concepts or inventions private or proprietary, do not send them in an email to us.

## **Services and Device Information**

When you access and use the Services, we automatically collect and store in server logs information from your browser or mobile device such as your IP address or unique device identifier, browser information (including referring URL), your preferences and settings, cookies and information about the content you have viewed and actions taken (e.g., search queries, ad engagement, clicks and the associated dates and times). We may also collect device-specific

information when you install and use an App including your device model, operating system information, advertising ID (which is a unique, user-resettable identification number for advertising associated with a mobile device) and App version and usage information. When enabled by you, we collect precise location information provided by your mobile device, which you may disable through the device settings.

## **Location Information**

When you use the Helpcentral Services, the Services request that you provide your address for any pick-up or delivery service. You may also be required to turn on your location to be able to use certain features of Helpcentral Platform. When you provide delivery and pick-up location, Helpcentral shares this with the Beneficiary or our delivery operation to ensure your gift is delivered or connect the donor and the beneficiary. In the case of a Campaign, please keep in mind that other users of the Services can view your city or town and state of residence in connection with the campaign, if it is made available on Helpcentral. We also use your location information as described above under "Device & Usage Information", and in an aggregate way, as described above in the "Aggregated Data" section.

## **Cookies and Other Tracking Technologies**

We and our partners use cookies to collect information about your use of the Services. "Cookies" are small data files assigned to your browser when you visit a Site which enable recognition of your browser and collect and store information about your use of the Services, as described above. In addition to cookies, we and our partners use other tracking technologies that collect information about your use of the Services, including mobile identifiers and "web beacons" which are small graphic files (sometimes called "clear GIFs" or "web pixels") embedded in a web page or email typically used to monitor activity and send relevant information back to a home server (which can belong to the host site, a network advertiser or some other third party).

Our advertising service partners may use cookies and other tracking technologies to collect information about your use of the Sites, including content you have viewed. These third parties may use this information to help us deliver advertising on the Sites and on other third party websites based on your browsing activity on the Sites. We may further tailor the advertising on the Sites and these other third party websites based on additional information to the extent known by us or these third parties. We also work with third party ad networks to display advertising on our Sites and on third party websites. Our ad network vendors use technologies to collect information about your activities on the Sites and in our App to provide you cookie-based targeted advertising on our Sites and on third party websites based upon your browsing activity and your interests.

When you download and install one of our Apps onto your mobile device we assign a random number to your App installation. This number cannot be used to identify you personally, and we cannot identify you personally unless you choose to become a registered user of the App. We use this random number in a manner similar to our use of cookies as described in this Privacy Policy. Unlike cookies, the random number is assigned to your installation of the App itself and not a browser, because the App does not work through your browser. Therefore the random number cannot be removed through settings. If you do not want us to use the random number for the purposes for which we use cookies, please do not use the Apps. Our use of cookies and

other tracking technologies on our mobile optimized sites and our App are similar to our use on our desktop sites.

## **How Information Collected About You Is Used**

Information about your use of the Services may be used for the following purposes:

- to provide, improve and create new Services,
- to respond to your inquiries and to send you administrative communications about the Sites and Services,
- to obtain your feedback about the Sites and Services,
- to send you secure electronic messages and personalized emails pertaining to your interests as inferred from your use of the Services, including news, announcements, reminders and opportunities from us,
- to statistically analyze trends and user behavior and activity including how frequently
  areas of the Sites are visited, how the Services are being used and how many emails are
  received and opened,
- to provide you and people with similar demographic characteristics and interests with more relevant content including advertising both on and off the Sites and Apps,
- to offer lead generation services,
- to detect and defend against fraud and other threats to the Services and our users,
- to identify issues with the Services,
- to conduct research and measurement activities, including those described below, and
- to administer your account.

In addition, we may use personal information about you for other purposes that are disclosed to you at the time we collect the information and/or with your consent.

We may combine your personal information and other information collected about your use of the Services, and also supplement with information from external sources for the purposes described in this Privacy Policy. For example, information that we collect about you may be combined by us with other information available to us through third parties for research and measurement purposes, including measuring the effectiveness of content, advertising or programs. This information from other sources may include age, gender, demographic, geographic, personal interests, product purchase activity or other information. We may report aggregate information, which is not able to be identified back to an individual user of the Sites, to our current or prospective advertisers and other business partners. We will not sell your personal information to third parties for their use without your consent.

## **Sharing Your Information**

## Our Subsidiaries and Corporate Affiliates

We may share your information with our subsidiaries, affiliates and companies acquired by or merged with us and our affiliates. In the event of a corporate change in control resulting from, for example, a sale to, or merger with, another entity, or in the event of a sale of assets or a bankruptcy, we reserve the right to transfer your personal information to the new party in control or the party acquiring assets. In the event of such a change, your personal information will continue to be treated in accordance with this Privacy Policy unless any changes to the Privacy Policy are made in accordance with the section below that discusses "Changes to This Privacy Policy."

#### Third Party Advertisers and Third Party Websites

We may share information that we have about you, such as a cookie ID or IP address, with third party advertising service providers who may use this information, on our behalf, to help us deliver advertising on the Sites as well as on third party websites.

Certain content, services and advertisements offered to you through the Sites are served on, or contain links to, websites hosted and operated by a company other than us ("Third Party Websites"). We do not share your personal information with these Third Party Websites without your consent, but you should be aware that any information you disclose to these Third Party Websites once you access these Third Party Websites is not subject to this Privacy Policy. We do not endorse and weare not responsible for the privacy practices of these Third Party Websites. You should review the privacy policy posted on the Third Party Website to understand how that Third Party Website collects and uses your information. We make an effort to make it obvious to you when you leave a Site and enter a Third Party Website, either by requiring you to click on a link or by notifying you on the Site before you visit the third party site. In addition, if you see a phrase such as "Powered by" or "in association with" followed by the name of a company other than us, then you are on a website hosted by a company other than us. When you use a co-branded service (a service operated with a partner), or register or otherwise provide information on a co-branded site, where applicable, we may pass the collected information back to that partner, which may include third party service providers whose services are embedded into and/or appear within the Services.

We may also include social widgets on the Sites which enable you to interact with the associated social media services, e.g., to share an article. These widgets may collect browsing data which may be received by the third party that provided the widget, and are controlled by these third parties. You may be able to manage your privacy preferences directly with the applicable social network platform.

#### Compliance with Law, Regulation, and Law Enforcement Requests

To cooperate with government and law enforcement officials and private parties to enforce and comply with law, we may release personal information to third parties: (1) to comply with legal requirements such as a law, regulation, search warrant, subpoena or court order; (2) when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request; or (3) in special cases, such as in response to a physical threat to you or others, to protect property or defend or assert legal rights. In addition, we may disclose personal information as described below.

#### **Your Choices and Rights**

## **Updating/Removing Your Personal Information**

If you do not want your personal information used by us as provided in this Privacy Policy, you should not use the Sites, Apps and Services. You can correct, update or review personal information you have previously submitted by going back to the specific Service, logging-in and making the desired change. You can also update any personal information you have submitted by contacting us using the contact information listed below or through the Contact Us link provided at the bottom of every page of the Sites.

If you have registered and desire to delete any of your registration information you have provided to us from our systems please contact us through the Contact provided the page of the Sites. Upon your request, we will delete your registration information from our active databases and where feasible from our back-up media. You should be aware that it is not

technologically possible to remove each and every record of the information you have provided to the Sites from our servers.

When you sign up to receive email communications for any of our Services, including our email newsletters, or at any time, you can choose to opt out of receiving additional newsletters or other email communications from us or our advertisers or sponsors.

You can unsubscribe from an email newsletter by following the directions included at the bottom of the newsletter and using the "Unsubscribe" link found in the emails.

## **Mobile Opt-out**

You may also control interest-based advertising on your mobile device by enabling the "Limit Ad Tracking" setting in your iOS device's settings or "Opt out of Ads Personalization" in your Android device's settings. This will not prevent you from seeing advertisements, but will limit the use of device advertising identifiers to personalize ads based on your interests. If you have questions about how to reject cookies on your specific device please check with the device manufacturer.

## Additional Information for Users inNigeria and the European Economic Area ("EEA")

When you use the Services, we collect, store, use and otherwise process your personal information as described in this Privacy Policy. We rely on a number of legal bases to process your information, including where: (i) necessary for our legitimate interests in providing and improving the Services including offering you content and advertising that may be of interest to you; (ii) necessary for our legitimate interest in keeping the Services, Sites and Apps safe and secure; (iii) necessary for the legitimate interests of our service providers and partners; (iv) necessary to perform our contractual obligations in the Terms of Use; (v) you have consented to the processing, which you can revoke at any time (however a revocation does not affect the lawfulness of processing of your personal data that occurred prior to the date of revocation); (vi) you have expressly made the information public, e.g., in a message board or other public forums; (vii) necessary to comply with a legal obligation such as a law, regulation, search warrant, subpoena or court order or to exercise or defend legal claims; and (viii) necessary to protect your vital interests, or those of others.

You can: (i) access personal information we have about you (we will try to provide information within 30 days of your request); (ii) have your personal information corrected or deleted (in most cases you can correct personal information you have submitted to us by going back to the specific Service, logging-in and making the desired change); (iii) in certain circumstances, you can object to our processing of your personal information and we will discontinue such processing unless we have compelling legitimate grounds to continue; (iv) withdraw consent previously provided (however a withdrawal does not affect the lawfulness of processing of your personal data that occurred prior to the date of withdrawal); or (v) if you believe that we have not complied with applicable data protection laws, you may lodge a complaint with your local supervisory authority. If you wish to inquire as to whether we maintain any of your personal information and if so, whether you wish to exercise any of those rights that are available to you with respect to such personal information, you may contact us as described on this Site. We will respond to your request within a reasonable timeframe.

Where we process your personal information for direct marketing purposes, you can opt-out through the unsubscribe link in the email communications we send to you, by changing your subscription preferences in your account settings or as otherwise specified in this Privacy Policy.

We will retain your personal information for as long as necessary to provide the Services to you and fulfil the purposes described in this Privacy Policy. This is also the case for third parties within whom we share your information to perform services on our behalf. When we no longer need to use your personal information and there is no need for us to keep it to comply with our legal or regulatory obligations, we will either remove it from our systems or anonymize it. If you have registered with us and you no longer want us to use your registration information to provide the Services to you, you may close your account.

## **Contacting Us About Your Personal Information or Privacy**

Please contact us via our website's Contact Us link/page or by email: <a href="mailto:info@helpcentral.ng">info@helpcentral.ng</a>if you have any questions about this Privacy Policy or the personal information we maintain about you.

### **Changes to this Privacy Policy**

We reserve the right to change or modify this Privacy Policy and any of our Services at any time and any changes will be effective upon being posted unless we advise otherwise. By continuing to use the Services after changes are made to this Privacy Policy, you agree to such changes. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices. If you do not accept the terms of this Privacy Policy, we ask that you do not register with us and that you do not use the Sites. Please exit the Sites immediately if you do not agree to the terms of this Privacy Policy.