

## PRIVACY POLICY

Last Updated: [16<sup>th</sup> February 2021]

This Privacy Policy (“**Policy**”) outlines Aurus Technologies Private Limited and its affiliates’ (“**EduGrow**”, “**we**”, “**our**” or “**us**”) practice in relation to the collection, storage, use, processing, and disclosure of personal data that you have chosen to share with us when you access the application titled ‘EduGrow’ and the website with the URL [[www.edugrow.com](http://www.edugrow.com)] (collectively, “**Platforms**”) and when you interact with our customer service and promotional activities conducted by us.

We are committed to protecting your personal data and respecting your privacy. Please read this Policy carefully to understand our practices regarding your personal data and how we will treat it. The Policy sets out the basis on which any personal data, that we collect from you or you provide to us, will be processed by us.

This Policy together with our [Terms and Conditions](#) (“**Terms**”) apply to your use of the Platforms through your phone, computer, or any other device (“**Device**”) and of the services accessible through the Platforms (“**Services**”).

Unless defined in this Policy, capitalised words shall have the same meaning as ascribed to them in our Terms. Please read this Policy in conjunction with our Terms.

### 1. THE DATA WE COLLECT ABOUT YOU

- (a) We may collect, use, store, and transfer different kinds of personal data about you in connection with your use of the Services, including but not limited to:
  - (i) identity data, including your name, username, date of birth, gender;
  - (ii) contact data including your email address and phone number;
  - (iii) guardian’s name, guardian’s phone number, and email address;
  - (iv) financial data including payment card details;
  - (v) transaction data including details of the Services availed and payments made by you on the Platforms;
  - (vi) technical data including IP address, login data, time zone setting and locations, operating system and Platforms, and other technologies on your Device used to access the Platforms;
  - (vii) profile data including your username and password, preferences, feedback, and survey responses;
  - (viii) usage data including how you use the Platforms and the Services; and
  - (ix) marketing and communications data including your preferences in receiving marketing from us and your communication preferences.
  
- (b) We 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 is not considered personal data 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 feature of the Platforms. 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 Policy.

- (c) Where we need to collect personal data by law, or under the terms of a contract, and you fail to provide that data when requested, we may not be able to perform the contract (for example, to provide you with 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.
- (d) If you would like to get a copy of the personal information you have provided to us, please reach out to us as provided in Paragraph 14.

## 2. HOW IS YOUR PERSONAL DATA COLLECTED?

We will collect and process the following data about you:

- (a) Information you give us - This is the information (including identity, contact, financial, marketing and communications data) you consent to giving us about you by filling in forms on the Platforms, by using our Services or corresponding with us (for example, by email or chat). It includes information you provide when you register to use the Platforms, download or register or subscribe to any of our Services, search for a Service, share your data with other users of the Platforms, promotion or survey, or other activities commonly carried out in connection with the Platforms, or when you report a problem with the Platforms and our Services. If you contact us, we may keep a record of the information shared during the correspondence.
- (b) Information we collect about you and your device - Each time you visit the Platforms or use one of our Services, we automatically collect personal data including technical and usage data. We collect this data using cookies and other similar technologies [See Paragraph 8].
- (c) Information we receive from other sources including third parties and publicly available sources - We receive personal data about you from various third parties and public sources including those set out below:
  - (i) Analytics providers such as Google and Facebook;
  - (ii) Search information providers;
  - (iii) Contact, financial and transaction data from providers of technical, payment and delivery services; and
  - (iv) Identity and contact data from publicly available sources.

## 3. AUTHENTICITY OF INFORMATION

- (a) We take all reasonable steps to ensure that the information on the Platforms is authentic.

- (b) You agree that the information and personal data you provide to us are true, correct, and accurate. We shall not be liable for any incorrect, inaccurate, or false information or personal data that you may provide to us.
- (c) You may review the information and personal data that you have provided during your use of the Platforms and choose to correct or modify it. You may do so by writing to us or our Privacy Officer at the address provided in Paragraph 14.

#### 4. HOW WE USE YOUR PERSONAL DATA AND FOR WHAT PURPOSES

- (a) You understand that we may share your personal data with other users who you interact with due to your use of the Platforms and third parties such as Flutter wave, Inc. and Africa's Talking International Limited in connection with or related to the provision of Services.
- (b) You are aware that by using or creating an account with the Platforms, you authorise us, our associate partners and affiliates to contact you via email, phone, or otherwise. This is to ensure that you are aware of all the features of the Platforms and other relevant services.
- (c) You authorise us to send you electronic alerts for details pertaining to registration, other service requirements, and for advertising.
- (d) Further, you agree to receive promotional and other emails and other forms of communication from us. Through such communication you will receive information about the latest updates on the Platforms and other relevant services. You may unsubscribe from our mailing list at any time by using the unsubscribe option we offer.
- (e) You are aware that any and all information pertaining to you, whether or not you directly provide it to us (via the Platforms or otherwise), including but not limited to personal correspondence such as emails or letters, instructions from you, etc., may be collected, compiled, and shared by us with third parties such as Flutterwave, Inc. and Africa's Talking International Limited in order to render Services to you.
- (f) Generally, we do not use your personal data except for the following purposes and activities:
  - (i) to install the Platforms and register you as a user;
  - (ii) to deliver Services including managing payments;
  - (iii) to manage our relationship with you including by notifying you of changes to the Platforms or Services;
  - (iv) to administer and protect our business and the Platforms including by troubleshooting, data analysis, and system testing;
  - (v) to deliver content and advertisements to you;
  - (vi) to make recommendations to you about the goods or services which may interest you;
  - (vii) to monitor trends so that we can improve the Platforms;

- (viii) to perform a contract that we are about to enter or have entered with you;
- (ix) to enforce our Terms;
- (x) where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- (xi) to comply with a legal or regulatory obligation.

## 5. CHILDREN'S DATA

We take the protection of children's privacy seriously. Individuals who are underage as per the appropriate applicable law for the purpose of providing consent should have a parent/guardian's consent before providing any personal data to us via the Platforms. Without such consent, the individual may not be able to access the Services. However, in certain circumstances, we may maintain and use information provided by such individuals (in accordance with the rest of this Policy and applicable law) in order to notify and obtain consent from the guardian and for certain safety, security, liability, record keeping, and other purposes permitted under applicable law. A guardian can review, remove, change or refuse further collection or use of their child's personal data by contacting us as set out in Paragraph 14, including child's name, address and e-mail address.

## 6. YOUR RIGHTS

Based on the data protection law applicable to you, you may have the following rights:

- (a) Access and correction: You have the right to access your data. If we agree that we are obliged to provide your personal information to you, we will provide it to you free of charge. However, before providing personal information to you, we may ask you to furnish proof of identity and any other information about your interactions with us as may be required to locate your personal information. If the personal information we hold about you is incorrect or inaccurate, you may ask us to rectify the same.
- (b) Object to processing: You have the right to a) object to processing of your personal information by us if we are not entitled to use your personal information anymore; b) have your information deleted if we are keeping it for too long; or c) have its processing restricted in certain circumstances.
- (c) You can make a request or exercise these rights by contacting us at the address provided in Paragraph 14 and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with the applicable laws and professional standards.

## 7. TRANSFER OF PERSONAL DATA

- (a) As a part of your use of the Platforms, the information and personal data you provide to us may be transferred to and stored at countries other than the one you are based in. This may happen if any of our servers from time to time are located in a country other than the one you are based in, or one of our service providers is located in a country other than the one you are based in. We may also share

information with entities of countries other than the one you are based in. Such entities shall be subject to data protection laws of their respective countries.

- (b) By sharing your information and personal data with us, you agree to the transfer, storage, and processing of such information and personal data outside the country you are based in, in the manner described above.

## 8. THIRD PARTY SERVICES

- (a) Our Platforms may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates (“**Third Party Services**”). Please note that the Third Party Services that may be accessible through our Platforms have their own privacy policies. We do not accept any responsibility or liability for the policies or for any personal data that may be collected through the Third Party Services. Please check their policies before you share any personal data to such third party websites or use any Third Party Services.
- (b) We use third-party user experience improvement services (including but not limited to those provided by both, Google Inc. and its affiliates) and applications to better understand your behaviour on the Platforms. The information collected includes (but is not limited to):
  - (i) age;
  - (ii) gender;
  - (iii) preferences; and
  - (iv) interests.
- (c) Your relationship with these third parties and their services and tools is independent of your relationship with us. These third parties may allow you to permit or restrict the information that is collected. It may be in your interest to individually restrict or enable such data collections.
- (d) The place of processing of information depends on the third-party service provider and you may like to check their privacy policy to identify the data shared and its purpose. If you opt in to receive communications from third parties, you will be subject to such third party’s privacy policy. We will not be responsible for their privacy standards and practices.

## 9. COOKIES

- (a) We use cookies to distinguish you from other users of the Platforms and remember your preferences. This helps us to provide you with a good experience when you use or browse our Platforms and also allows us to improve the Platforms.
- (b) We collect data by way of ‘cookies’. Cookies are small data files which are sent to your browser from the Platforms and are stored on your computer or device (hard drive). The cookies shall not provide access to data in your computer or device such as email addresses or any other data that can be traced to you

personally. The data collected by way of cookies will allow us to administer the Platforms and provide you with a tailored and user-friendly service. The cookies shall enable you to access certain features or both, the Platforms and the Services. Most web browsers and devices can be set to notify when you receive a cookie or prevent cookies from being sent. If you do prevent cookies from being sent, it may limit the functionality that we can provide when you visit the Platforms.

- (c) Additionally, you may encounter cookies or other similar devices on certain pages of the Platforms that are placed by third parties. We do not control the use of the cookies by third parties. If you send us personal correspondence, such as email or letter, or if other users or third parties send us correspondence about your activities or postings on the Platforms, we may collect such information into a file specific to you.

## 10. DATA SECURITY

- (a) We implement certain security measures including encryption, firewalls, and socket layer technology to protect your personal information from unauthorised access and such security measures are in compliance with the security practices and procedures as prescribed under the applicable laws. However, you agree and acknowledge that the above-mentioned measures do not guarantee absolute protection to the personal information and by accessing the Platforms, you agree to assume all risks associated with disclosure of personal information arising due to breach of firewalls and secure server software.
- (b) Where we have given you (or where you have chosen) a password that enables you to access certain parts of our Platforms, you are responsible for keeping that password confidential. We ask you to not share the password with anyone.

## 11. DATA RETENTION

You agree that your personal data will continue to be stored and retained by us for a reasonable period after termination of your account on the Platforms.

## 12. BUSINESS TRANSITIONS

You understand and agree that in the event we go through a business transition, such as a merger, acquisition by another organisation, or sale of all or a portion of our assets, your personal data might be among the assets transferred.

## 13. CHANGE IN PRIVACY POLICY

- (a) We keep our Policy under regular review and may amend this Policy from time to time, at our sole discretion.

- (b) The terms of this Policy may change and if they do, the changes will be posted on this page and, where appropriate, notified to you by email. The new Policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the Platforms and the Services.

#### 14. PRIVACY OFFICER

You may contact us at [info@edugrow.com] for any enquiry relating to this Policy or your personal information (for example: reviewing, updating, or seeking deletion of your information). You can also do so by writing to our Privacy Officer at the address provided below:

Name: [Segun Michael Ogundele]  
Address: [Block C, No. 34, Korau Road, Nasarawa GRA, Kano State, Nigeria]  
Email: [segun.ogundele@edugrow.com]  
Contact No: [+234 80 2212 7458]

We will acknowledge your email within 48 hours and seek to resolve your concern within [1] month of its receipt. We may accept your concern (and in that case implement one of the measures set out in Paragraph 5 above), or we may reject your concern on legitimate grounds.

In any event, you always have the right to lodge a complaint with relevant regulatory body, which is in charge of protecting personal information.