

RUNBETA PRIVACY POLICY

WHO WE ARE

We are RunBeta Biz Ltd (“Runbeta”, “we”, “us”, or “our”). We process your personal data if you are a user of our App or website (“platform”).

If you have any questions about how we collect, use or share your data, please contact us at support@runbeta.io, or write to us at RunBeta Biz Ltd, 1 Von Garden Estate, Lugbe, AMAC, FCT, Abuja, Nigeria.

WHAT IS THE PURPOSE OF THIS POLICY?

We are committed to protecting the privacy of our users. We have written this Privacy Policy to ensure you have all the information you need about how we collect and process your personal data, and how we make sure it is kept safe. When we collect and process your personal data, we are regulated under the Nigeria Data Protection Act, 2023.

THE PERSONAL DATA WE COLLECT

To provide our services, RunBeta collects, processes, and securely stores certain personal data. This data includes information you provide directly to us and information we collect automatically.

Information You Provide to Runbeta

We receive and store any personal data you provide to us when you set up a user account. The information you provide to us are:

- **Contact Data** - your first and last name, salutation, your address, phone number, email address.
- **Identification Data** – your National Identification Number and passport photograph.
- **Online Identifiers and Account Information** - your username and passwords for our platform and transactional information carried out with your account, such as order histories.
- **Payment Data** – your account number and details of your payment transaction.
- **Communications Data** – messages (emails, SMS, WhatsApp, phone calls) that you send to us in the course of using our service.
- **Marketing Data** - your preferences for receiving our marketing communications and details about your engagement with the marketing communications.
- **Location Data** - We may collect and use location data to enable location-based features of the Platform, such as displaying nearby service providers, facilitating bookings, and improving user experience. Location data may be collected as approximate location (such as IP-based location) or precise location where you

grant location permissions. You can control location permissions through your device settings.

Information We Collect Automatically

We and our service providers may automatically collect and store certain types of information about you, your computer or mobile device, and your interaction with our platform over time such as:

- **Log Data** - Our servers may collect "log data." Log data provides aggregate information about the number of visits to different pages on the Website.
- **Technical Data**- This includes online identifiers such as internet protocol (IP) address, browser type and version, login data, location and time zone, operating system, browser plug-in types and versions, device ID and other technologies on the device used to access our platform.
- **Usage Data** - This involves data detailing a user's interaction with the website/application.

Cookies

Some of the data we collect automatically is facilitated by cookies and similar technologies. For more information on how we use cookies, see our [Cookies Policy](#).

Sensitive Data

We do not collect sensitive personal data, for example, biometric data, health data, or data revealing racial or ethnic origin, from our users.

Children Data

Our services are strictly not directed to children under the age of 18. We do not knowingly collect personal data from individuals under 18 years old. If we become aware that we have collected personal data from a minor without parental consent, we will take immediate steps to delete that information.

HOW WE USE YOUR PERSONAL DATA

We collect personal data for purposes of:

Services and Operations

- To set up and administer your account
- Verification of your identity
- Delivering our services to you
- Facilitating your booking and delivering the services to you
- Responding to complaints, questions and feedback and providing information about your requested service
- Receiving feedback about our services

Commented [LK1]: Provide a link to the Cookies Policy.

Please note that Data Controllers are required to display a cookie banner prominently on their platforms. For strictly necessary cookies, an explicit "opt-in" (such as ticking a box or similar methods) is not required. In this context, "strictly necessary cookies" refer to those essential for core functionality, such as security, network stability management, and accessibility. All other cookie types that are not strictly necessary require a specific "accept" or "reject" selection option presented to the data subject.

Commented [AA2R1]: Talk to TechUgo/Prince regarding cookie banner display on the platforms and options to opt in and out

- Administering the platform and other systems and protecting them
- To improve the platform and services, using data analytics
- Showing you content and features that are personal to you and your interests
- Understanding your preferences for marketing, cookies and any other processing activities that you can opt-out of
- Providing customer service and support
- Notifying you of changes to our services or platform
- Comply with applicable laws, lawful requests, and legal process

LEGAL BASIS FOR THE PROCESSING OF USERS' DATA

We collect your personal data in order to facilitate and manage our relationship with you. Specifically, we collect your personal data for at least one of the following legal bases:

1. Performance of a Contract

We process your Contact Data, Online Identifiers and Account Information, Payment Data, and Communications Data for the purpose of performing our contract with you, including:

- Creating and maintaining your RunBeta account;
- Facilitating bookings and enabling communication between users, service providers and Runbeta;
- Processing payments;
- Providing customer support and resolving issues related to requested services.
- Delivering our services to you

2. Compliance with a Legal Obligation

We process Contact Data, Online Identifiers and Account Information, Payment Data, and Communications Data to meet obligations under applicable laws, including:

- Responding to lawful requests from regulators or law enforcement;
- Compliance with tax, accounting, fraud-prevention or reporting requirements.

3. Legitimate Interests

We process Contact Data, Identification Data, Online Identifiers and Account Information, Payment Data, Communications Data, Log Data, Usage Data and Technical Data where it is necessary for our legitimate interests, provided such interests are not overridden by your fundamental rights and freedoms. These include:

- Improving and securing our platform;
- Preventing fraud and ensuring platform safety;
- Verifying the identity of our users;

- Analysing trends and service usage to enhance user experience;
- Ensuring the quality of services rendered by service providers on the platform;
- Requesting and receiving feedback about our service;
- Operating the platform;
- Notifying you of changes to our services or platform.

4. Consent

We rely on your consent for specific processing activities, including:

- Sending marketing and promotional communications to you;
- Using cookies or similar tracking technologies (other than strictly necessary cookies);

You may withdraw your consent at any time without affecting the lawfulness of processing carried out prior to withdrawal.

WHO WE SHARE YOUR PERSONAL DATA WITH

We prioritize the security and confidentiality of your data and will never sell your personal data. We only disclose it to the necessary third parties listed below to operate, secure, and improve our services. We may share your data with the following third parties:

Service Providers: We share your data with companies we have engaged to help us run our business and provide you with the services you signed up for. They act strictly on our instructions. This includes:

- **Checking Your Identity:** We share data with identity verification providers to confirm who you are.
- **Running the Platform:** We share data with companies that help us process your payments, host our data, analyse how the app is used.

Legal and Regulatory Bodies: We may have to share your data if the law requires it.

- **Legal Duty:** If required by law, we will share data with government, tax, or law enforcement agencies.
- **Protection:** To protect our legal rights, enforce our contracts, or ensure the safety and security of our users and the public.

Marketing and Ad Partners: We may share certain identifiers and profile data with media agencies and advertising partners to provide you with personalized, relevant advertisements based on your consent and usage of our services.

DATA RETENTION

RunBeta will only retain your personal data for as long as reasonably necessary to fulfil the purposes the data was collected, including the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

To determine the appropriate retention period for personal data, RunBeta will consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the personal data, the purposes for which the data is to be processed and whether the purposes can be achieved through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

When we no longer require the personal data we have collected about you, we may either delete it or de-identify, aggregate or anonymise it. If we de-identify, aggregate or anonymise your personal data (so that it can no longer be associated with you), we may use the anonymised data indefinitely without further notice to you.

YOUR RIGHTS

Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have the following rights under data protection laws:

1. **Right of access:** You have the right to ask us for copies of your personal data.
2. **Right to rectification:** You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
3. **Right to erasure:** You have the right to ask us to erase your personal data in certain circumstances.
4. **Right to restriction of processing:** You have the right to ask us to restrict the processing of your personal data in certain circumstances.
5. **Right to object to processing:** You have the right to object to the processing of your personal data in certain circumstances.
6. **Right to data portability:** You have the right to ask that we transfer the personal data you provided us to another organisation.
7. **Right to withdraw consent at any time:** Where we are relying on consent to process your personal data, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.

Exercising These Rights

You may submit these requests by email to support@runbeta.io. We may request specific information from you to help us confirm your identity and process your request. Whether or not we are required to fulfill any request you make will depend on a number of factors (e.g., why and how we are processing your personal data), if we reject any request you may

make (whether in whole or in part) we will let you know our grounds for doing so at the time, subject to any legal restrictions.

Your Right to Lodge a Complaint with the Nigeria Data Protection Commission

In addition to your rights outlined above, if you are not satisfied with our response to a request you made, or how we process your personal data, you can make a complaint to the to the Nigeria Data Protection Commission by mail to info@ndpc.gov.ng or a letter addressed to No.12 Dr. Clement Isong Street, Abuja.

HOW DO WE PROTECT YOUR PERSONAL DATA?

We have adopted appropriate technical and organisational measures to secure your personal data as required by law. Our security systems are designed to prevent the loss, unauthorised destruction, damage, and/or access to your personal data from unauthorised third parties. Some of our security measures include physical access controls to our premises, cyber security controls, and information access authorisation controls.

While we are dedicated to securing our systems and services, you are responsible for securing and maintaining the privacy of your password(s) and account/profile registration information and verifying that the personal data we maintain about you is accurate and up to date.

We will duly inform you of any breaches that may threaten the security and confidentiality of your personal data.

UPDATES TO THIS PRIVACY POLICY

We understand that things change, so we will continue to review the effectiveness of this policy and make sure it is achieving its goals. We might update the policy from time to time and will post the most recent version on this page. If we make a change to this policy that we consider material, we will notify you.