Privacy Policy

Effective Date: 7th March 2025

This Privacy Policy explains how **WEEK FORTY-TWO TECH LIMITED** ("Week42") collects, uses, and protects your personal data when you use AxlerodTM (the "Service"). It is designed to align with Zambia's Data Protection Act and with industry-standard data protection principles.

1. Introduction

Week42 operates the cloud-based TMS for small and medium logistics companies. We respect your privacy and handle personal data responsibly.

2. Data We Collect

- Account Data: name, email, contact, company.
- **Operational Data:** trip details, driver assignments, route plans, uploaded documents (Delivery Notes, GRNs).
- Usage Data: access logs, device/browser info, IP addresses.
- **AI Interaction Data:** inputs to and outputs from Axe AI.

3. How We Collect Data

- Directly: when you register or upload documents.
- Automatically: via our cloud infrastructure (Firebase and Google Cloud Platform).

4. Purpose & Legal Basis for Processing

We process your data to:

- Provide and maintain the Service under your pre-paid Subscription.
- Improve and secure the Service in line with internal policies and industry best practices.
- Communicate updates, billing, and support information with your consent.

5. Use of Aggregated, Non-Identifying Data

- We transform personal data into **Aggregated Data** (data that cannot identify any individual) for analytics, AI model training, benchmarking, and other revenue-generating activities.
- Unused Data Definition: any data not accessed for 180 days is classified as "Unused Data" and moved to a secure archive; archived data is deleted after 2 years, unless legal obligations require otherwise.

6. Data Sharing & Subprocessors

• We do **not** share personal data with other clients.

• We use Firebase and Google Cloud Platform as subprocessors, which may process and store data globally under strict confidentiality and security controls.

7. Data Transfers & Storage

- Data may be transferred and/or stored outside Zambia
- We employ industry-standard encryption and binding contractual agreements to protect data in transit and at rest.

8. Data Retention

- Active Data: retained while your account is active and subscriptions are current.
- Unused Data (≥180 days idle): moved to archive.
- Archived Data: securely deleted after 2 years, unless legal requirements dictate otherwise.

9. Your Rights

- You have the right to access, correct, delete, or export your personal data, and to object to its processing.
- To exercise these rights, contact <u>operations@axlerodtms.com</u>.

10. Data Security

• We use industry-standard TLS encryption, role-based access controls, and regular security assessments to protect your data.

11. Changes to This Privacy Policy

• We may update this policy; material changes will be communicated at least 30 days in advance.

12. Contact Us

For privacy or data inquiries, email: <u>operations@axlerodtms.com</u>