

PRIVACY POLICY FOR COURIER AGENTS

As a courier and logistics services company, Cuzoo shall have access to the personal information of both our customers and courier agents ("User"). Pursuant to the laws of the territory and our policy to keep every personal data of our agents and customers private and secure, this Privacy Policy ("the Policy") shall establish how we use the personal data of our users and the safety measures in place to keep such information confidential.

1. PROCESSING PERSONAL DATA

The data of courier agents we collate to process are:

- Personal details such as home address, phone number and email address etc.
- The user's guarantor's details which include home and office address, phone number, email address, etc.
- Documents such as identity cards, utility bill, drivers or riders license and permits, etc.
- Every requisite information concerning the vehicles of our courier agents.
- Bank account details of the courier agent.
- Every correspondence made by the courier agent through the app either to our customers or between us and them.
- The geo-location of the courier agent.
 - Personal details and documents are used to process the account of the courier agent on the platform to ensure that the driver or rider is a resident in the country and is accessible by us and our customers. It helps to ensure the courier agents are legal persons with verifiable identities and reduce possibility of fraud.
 - We know our courier agents better by processing the guarantor's details as there is someone readily available who can vouch for their integrity and probity and protect our customers from unscrupulous persons who want to abuse the platform or deceive our customers.
 - The licenses and permits are requisite to know if the vehicle is in good condition and in consonance with all legal requirements for a roadworthy vehicle in the territory. We shall reject vehicles which are not duly licensed as this shall portend danger for the delivery process and to prevent avoidable risks to our customers' goods.
 - The bank account details are limited to the basic information such as account number and name of the user, etc. which are requisite to allow our financial gateway partners to process payment for our courier agents and ensure smooth and secure payment.
 - Data relating to correspondence/notices on the app are processed to help provide support for our courier agents, updates on the app, order requests and ensure there are no delays in payment services.
 - The geo-location and route of the courier agent is processed to provide support and advice on the best routes to navigate, circumvent traffic and enable expeditious fulfilment of collection and delivery requests when the driver or rider is within the customer's vicinity.

Cuzoo shall use your personal information for the purpose of courier and logistics services and any other purpose(s) shall be deemed a breach of confidentiality, subject to other provisions of the Terms of Usage and the Policy.

2. CUSTOMERS AND RECIPIENTS

- Customers shall have access to the user's identity as there shall be a notification on the USER app with the photograph of the courier agent who shall collect their goods. This personal data is to ensure that the person collecting the goods is our verified courier agent and to protect the customer from fraud or deceit in any form.

- Customers are under a legal obligation to keep the personal information of our agents confidential and any disclosure of any personal data to a third party shall be a breach of their legal obligation.
- The customers are also privy to the location of the courier agent from the point of collection to the point of delivery. The purpose of the disclosure is to enable the customer to track the progression of the delivery process and acknowledge when the goods have reached the prescribed destination.
- During the delivery process, recipients may become aware of the identity of the courier agent as the user is under obligation to contact the recipient to verify the location or availability of the recipient. What information to disclose to the recipient is at the discretion of the courier agent as this Policy only protects the information disclosed to the customer and not the recipient.
- The courier agent is advised to use tact and exercise caution while communicating to the recipient of the goods to adequately keep personal information relating to the company or the user secure and confidential.

3. BUSINESS PARTNERS / SERVICE PROVIDERS

- Cuzoo shall partner with several corporations and SMEs which are involved in multifarious trading activities and technicians, or service providers involved in maintaining and updating the app to ensure it is always accessible to our users.
- The agreement with our business partners shall give them access to the personal data of any courier agent assigned to provide courier or logistics services to them and they shall use this information to process orders, contact the user or other courier services.
- Our partners shall be under a contract to keep the personal data of our courier agents confidential and any disclosure which is not in tandem with courier or logistics services shall be a breach of the contract which shall make them liable for damages.
- Third Party service providers shall also be employed to help maintain and update our platform and provide the best logistics features for our users.
- Users are hereby informed that all third parties shall be under a strict nondisclosure agreement to keep our technical know-how, the identity of our users, partners, customers, or private information about Cuzoo confidential and destroy or return such information after completion of their duties.

4. COURIER AGENTS DUTY OF CONFIDENTIALITY

- The identity and location of customers, recipients or business partners are made available to the courier agent. This ensures that the courier agent can easily access the location of the customer or recipient and can recognize them adequately.
- The courier agent is under a legal obligation to protect the personal information of our partners, customers and recipients and shall not disclose such information to a third party EXCEPT for courier or logistics purposes.
- Any disclosure of the personal data of customers or recipients which is not in furtherance of logistics or courier purposes shall be deemed a breach of the duty of confidentiality and the courier agent shall be personally liable for the breach.
- Confidential or personal information relating to Cuzoo, her employees and stakeholders shall also be readily available to the courier agent which the latter is under a duty to keep confidential and shall not disclose any such information EXCEPT in furtherance of the contract between Cuzoo and the courier agent or to fulfil any courier or logistics order(s) on the platform.
- No user is under a duty to keep confidential information in the following instances:
 - Where the information is disclosed in furtherance of rendering service to our customers and the user has been authorized by the company or the customer to disclose the information prior to the disclosure by the user.

- Where the disclosure is compelled by a governmental body or legal authority or by any extant law prevalent in the territory to be made by the user.
- Where the personal information is public knowledge prior to the disclosure by the user.
- Any breach of the duty to keep personal or corporate data confidential shall be enforceable in any court of competent jurisdiction within the territory and the courier agent shall be liable for damages.

5. STORAGE AND RETENTION OF PERSONAL DATA

- Data shall be stored in the firewalls of Cuzoo and the user can have access to their information on their personal account on the platform.
- The data shall be stored if the user has an account on the app or web and the data can be updated, changed, or deleted by the user at any time.
- The platform shall utilize cookies to ensure that the user's preferences are stored and accessible by the user at any time. It is at the user's discretion to choose whether to accept or reject these cookies.
- Personal data shall be deleted as soon as practicable when a user's account is deleted EXCEPT in the event of a legal dispute between the user and the company or in the event of allegations of fraud or any fraudulent activity on the platform wherein the data shall be retained for as long as it is necessary to meet any legal or regulatory requirements.
- Every legal claim or default in remission of payments shall lead to retention of data until the claim is satisfied or payment is remitted to the company.

6. SECURITY

- To prevent unauthorized use of the user's account on our platform, we have implemented strong controls and security safeguards at both the technical and operational level.
- We use modern technical methods to protect your information on our servers. This includes but is not limited to firewalls, data encryption and information access authorization controls. We use these methods to prevent alteration or access to passcodes, misuse of the platform and disclosure of passcodes to third parties.
- At the operational level, we ensure that there is physical control of access to our premises and only employees shall have access to personal information of courier agents.
- Both the management and their span of control are under a strict confidentiality agreement and disclosing customer data is a breach of their contractual/employment obligations respectively for which there shall be profound repercussions for such breach.
- As no security measure is wholly impeccable, courier agents are implored to ensure they protect their accounts and passcodes from third parties. They should adopt personal security measures such as nondisclosure of passcodes to third parties, deal with only authorized agents of the company and adhere to all security protocols on the platform.

7. DISPUTE RESOLUTION

- Any dispute or complaints arising from the use of personal data, or any breach thereof shall be reported to our customer care representatives and shall be resolved as soon as practicable.
- The supervisory authority of any dispute resolution process shall be the Cuzoo Data Enforcement and Management Department.

8. APPLICABILITY AND ENFORCEMENT

- The prerequisite of the usage of the Cuzoo platform is based on processing of the user's personal data. All courier agents, partners and service providers are hereby bound by the terms of usage and the privacy policy.

- Our privacy policy is made in pursuance to the fundamental right of every individual to privacy enshrined in the Constitution of the Federal Republic of Nigeria (1999) as amended and all existing laws in the territory including the Data Protection Regulation of 2019 and any rule of international law on protection of personal information.
- Where any provision or part of the Policy is deemed to be inconsistent with any legislation in force, regulation or international convention, such provision shall be null and void and of no effect as though it was never a provision or a part of the Policy.
- The Terms of Usage and the Privacy Policy are legal documents which stipulates the relationship between the users and the company is therefore enforceable by any court of competent jurisdiction in the territory.