

Privacy Policy for Hedge Collective Limited

1. Introduction

The Hedge Mobile App is provided by Hedge Collective Limited (“Hedge”).

Hedge values your privacy and is committed to safeguarding your personal information. All personal data that you provide us will be protected and kept confidential among our affiliates, representatives, and privies.

Throughout this policy, the terms “we”, “us” and “our” refer to Hedge.

This Privacy Policy explains how we collect, use, share and protect your personal data or any personal data that you share with us in connection with your relationship with us as a user or potential user. It also sets out your rights in relation to your information and who you may contact for further information.

The Privacy Policy applies to all our clients, potential clients, consultants, partners, and every other person we hold information about. Essentially, this Privacy Policy applies to you if you visit or use our mobile application (“Platform”), access our services or interact with us in any legal, contractual or business purpose, and/or perform any other activities that form part of our business.

You agree to this Privacy Policy by visiting our Platform and when you use our services.

Your use of our services, and any dispute over privacy is subject to this Policy and our Terms of Service, including its applicable limitations on damages and the resolution of disputes. Our Terms of Service are incorporated by reference into this Policy.

Our Platform and services are not directed at you if we are prohibited by any law of any jurisdiction from making the information on our Platform available to you and is not intended for any use that would be contrary to local law or regulation.

2. Consent

You accept this privacy policy when you give consent upon accessing our Platform, or using our services, content, features, technologies or functions offered on our Platform or visit any of our offices for official or non-official purposes. If you do not

agree with the terms outlined in this Privacy Policy, it is necessary to refrain from accessing our services or Platform or providing any information to us.

Note that you may choose to withdraw your consent at any time. The withdrawal of your consent will prevent us from providing our services to you.

3. Age Restriction

You affirm that you are over the age of 18 years and have the right to contract in your own name, and that you have read the above authorisation and fully understand its contents.

4. Information We Collect.

There are two categories of information we collect. We collect a variety of information from our users and visitors to our Platform. As described below, some information is automatically collected when you visit our Platform, and some you provide to us when filling out a form or communicating with us.

4.1. **Information Collected Automatically:** Whenever you access our Platform, our servers automatically collect non-personal information such as the domain name of the internet access provider, the internet protocol address used to connect the computer to the internet, the average time spent on our Platform, pages viewed, information searched for, access times, and other relevant statistics.

4.2. **Information You Provide Us:** If you provide us with personal information, by contacting us, or subscribing to our services we collect the following personal information:

4.2.1. Profile Data such as your username, password and means of identification;

4.2.2. Contact information such as address, email address, country and telephone number; and

4.2.3. Any other information you provide to us.

4.3. We may collect sensitive or special categories of personal data as part of Know-Your-Customer (KYC) and Anti-Money Laundering (AML) checks that we must conduct before accepting you as a user.

- 4.4. We may also collect personal data about you indirectly from third parties including but not limited to (i) third parties such as providers of KYC and AML services to help us meet our legal obligations and verify your identity where we provide you with our services; (ii) background check providers; (iii) third party service providers that help us operate our platforms; (iv) your banks and financial institutions; (v) credit reference organisations.

5. Using Your Personally Identifiable Information

“Personally Identifiable Information” means any information that (a) identifies or can be used to identify, contact, or locate the person to whom such information pertains, or (b) from which identification or contact information of an individual person can be derived.

We primarily collect your information to ensure that we provide the most efficient service to you, monitor the use and improve our Platform and other legitimate interests. Your information will solely be used and disclosed for the following purposes:

- 5.1. To help us verify your identity;
- 5.2. To carry out our obligations ensuing from any contracts entered into between you and us;
- 5.3. To provide you with the products, services and information you request from us;
- 5.4. To assist you with enquiries and improve our customer service;
- 5.5. To assist us in carrying out marketing analysis and customer profiling (including transactional information), conduct research, including creating statistical and testing information;
- 5.6. To allow us to communicate with you in any way (including e-mail, telephone, visit, and text or multimedia messages);
- 5.7. For our billing and account purposes;
- 5.8. To help prevent and detect fraud or loss;
- 5.9. To update our records;
- 5.10. To make recommendations and suggestions to you about services offered by us unless you have previously asked us not to do so;
- 5.11. To send you service or support messages, such as updates, security alerts, email notifications and /or newsletters;

5.12. To conduct investigations and risk assessments; and

5.13. For compliance with legal and regulatory obligations.

6. Data Accuracy

Your personal data must be accurate and kept up to date. In this regard, Hedge shall ensure that any data it collects and/or processes is accurate and not misleading in a way that could be harmful to you; make efforts to keep your personal data updated where reasonable and applicable; and make timely efforts to correct or erase your personal data when inaccuracies are discovered.

7. Other Information We Collect

Other information which may be automatically collected from you when you visit our Platform include; domain name of your internet service provider, the internet protocol address used to connect the computer to the internet, the average time spent on our Platform, pages viewed, information searched for, access times, your geographical location, operating system, referral source, and other relevant statistics.

We may also collect information from you using cookies and other analytical tools especially when you use our products and services. More details are provided below in our section on Cookies.

8. Data Confidentiality

Your information is regarded as confidential and will not be divulged to any third party, except under legal and/or regulatory conditions. You have the right to request copies of any and all information we keep on you if such requests are made in compliance with applicable laws. While we are responsible for safeguarding the information entrusted to us, your role in fulfilling confidentiality duties includes but is not limited to, adopting, and enforcing appropriate security measures such as non-sharing of passwords and other platform login details, adherence with physical security protocols on our premises, dealing with only authorized officers of Hedge.

9. Disclosures

9.1. We will not sell, publish, or disclose to third parties your personally identifiable information collected on our Platform, through our servers or otherwise obtained by us, other than to provide our services and as set forth in this

Privacy Policy. We may share generic aggregated demographic information not linked to any personally identifiable information regarding visitors and users with our business partners, trusted affiliates, professional advisers, and advertisers for the purposes outlined above. We may share your information with these third parties for those limited purposes if you have given us your permission in compliance with the applicable data protection laws including the Nigerian Data Protection Act 2023, the Nigeria Data Protection Regulation 2019 (NDPR), the General Data Protection Regulation 2018 and other data protection laws that apply to the processing of your data (Data Protection Laws).

- 9.2. We may request and provide information about you from and to third parties to provide our services.
- 9.3. We will notify you as soon as we become aware of a harmful data breach which may result in a risk of your rights and freedom.
- 9.4. You have the right to request an erasure of your data at any time.
- 9.5. We will notify you if we are transferring your data.
- 9.6. You may request at any time that we halt further dissemination of your data or cease to use your data.
- 9.7. If you submit content in a public forum or a social media post, or use a similar feature on our Platform, that content is publicly visible.
- 9.8. We may disclose Personally Identifiable Information if required to do so by law or in the good faith belief that such action is necessary to (a) conform with the requirements of the law or comply with legal process served on us, or (b) act in urgent circumstances to protect the personal safety of users of our service or members of the public.
- 9.9. To the extent practicable and legally permitted, we will attempt to advise you prior to any such disclosure, so that you may seek a protective order or other relief limiting such disclosure.

10. Transfer of Personal Data

10.1. Third Party Processor

We may engage the services of third parties in order to process your personal data. The processing by such third parties shall be governed by a written contract with Hedge to ensure adequate protection and security measures are put in place by the third party for the protection of your personal data in

accordance with the terms of this policy and Data Protection Laws.

10.2. Transfer of Personal Data to Foreign Country

10.2.1. Where your personal data is to be transferred to a country outside Nigeria, Hedge shall put adequate measures in place to ensure the security of such data. In particular, Hedge shall ensure that such transfer is in accordance with Data Protection Laws and that the foreign country receiving such data has adequate data protection laws. We will also always document the basis of such international transfers and the adequacy of data protection relied upon.

11. Your Rights

Subject to certain limitations and exceptions, you are entitled to the following principal rights:

- 11.1. You have the right to be notified if we are transferring your personal information.
- 11.2. You have the right to request an erasure of your personal information at any time.
- 11.3. You have the right to request that we rectify inaccurate personal information.
- 11.4. You may request at any time that we halt further dissemination of your data or cease to use your personal information.
- 11.5. You have the right to request for copies of your personal information.
- 11.6. You have the right to file a complaint with the Data Protection Commission if you are unsatisfied with how we process your data.
- 11.7. You may also withdraw your consent at any time by sending a withdrawal notification to the email provided below. Kindly note that a withdrawal of consent will not affect already processed data and we may retain your information as required by law.

12. Platform Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. We use encryption tools when accepting and transmitting delicate visitor information through our Platform. Some of the other safeguards we use are firewalls and physical access controls to our data centres, and information access authorization controls.

13. Training

We shall ensure that employees who collect, access and process your personal data receive adequate data privacy and protection training in order to develop the necessary knowledge, skills and competence required to effectively manage the compliance framework under this policy and Data Protection Laws with regard to the protection of personal data. On an annual basis, we shall develop a capacity-building plan for our employees on data privacy and protection in accordance with Data Protection Laws.

14. Use of Cookies

We use cookies to identify you as a user and make your user experience easier, customise our services, content and advertising; help you ensure that your account security is not compromised, mitigate risk and prevent fraud; and to promote trust and safety on our Platform. Cookies allow our servers to remember your account log-in information when you visit our Platform, IP addresses, date and time of visits, and prevent fraudulent activities. If your browser or browser add-on permits, you have the choice to disable cookies on our Platform; however, this may limit your ability to use our Platform.

15. The Data We Retain

We will retain your information for as long as needed to provide you with our services, comply with our legal and statutory obligations or verify your information with a financial institution.

We are obligated to retain the data you provide to us in order to process transactions, ensure settlements, make refunds, identify fraud and be in compliance with laws and regulatory guidelines applicable to us, our banking providers and credit card processors.

16. Data Breach Management Procedure

16.1. In the event where there is any accidental or unlawful destruction, processing, loss, alteration, unauthorized disclosure of or access to your personal data, we shall:

16.1.1. notify you within 24 hours of the occurrence of the data breach;

16.1.2. properly investigate the breach and take the necessary steps to mitigate such breach;

16.1.3. identify remediation requirements and track the resolution of such breach; and

16.1.4. notify the appropriate regulatory authority, where necessary.

17. Links to Third Party Platforms

17.1. Our Platform may contain links to third-party Platforms or services that are not owned or controlled by us.

17.2. We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third-party Platforms or services. You further acknowledge and agree that we shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such Platforms or services.

17.3. We strongly advise you to read the terms and conditions and privacy policies of any third-party Platforms or services that you visit.

18. Limitation of Liability

We exercise reasonable efforts to safeguard the security and confidentiality of your personal data; however, we will not be liable for unauthorised disclosure of personal data that occurs through no fault of ours.

19. Changes to this Privacy Policy

Changes may be made to this Privacy Policy from time to time. Whenever such changes are made, we will notify you. These changes will take effect immediately after you have been notified.

20. Contact Us

If you would like more information or have any comments or questions on our privacy policy, please contact us at support@hedgebuck.com

This policy is effective as of 01 May 2024

Last updated: 01 May 2024.