

Phundit Privacy Policy

Effective Date: September 2024

1. Introduction

Welcome to Phundit. This Privacy Policy explains how Phundit LTD (“Phundit”, “we”, “us”, or “our”) collects, uses, shares, and protects your personal information when you access or use our website, mobile application, and any associated services (collectively, the “Platform”). This Policy forms part of our overall Terms of Use and is intended to ensure transparency about our data practices and your rights.

2. Definitions

For the purposes of this Policy:

- **“User”** means any individual or entity that accesses or uses our Platform.
- **“Personal Information”** refers to any information that can be used to identify you, including without limitation your name, email address, phone number, and other contact or financial details you voluntarily provide.
- **“Usage Data”** includes automatically collected information (e.g., IP address, device identifiers, browser type, and log data).
- **“Cookies and Tracking Technologies”** refer to tools used to collect information on our Platform.
- **“Third-Party Service Providers”** are external companies that perform services on our behalf.
- **“Black Star Advisors” (BSA)** is our licensed investment partner regulated by the Securities and Exchange Commission of Ghana, whose investment products (e.g., the Fixed Income Alpha Plus Fund) are available through our Platform.
- **“Zoe”** is Phundit’s AI assistant, which provides general information, navigation help, and customer support. Zoe does not use your personal data for training purposes unless you explicitly opt in.

3. Information We Collect

We collect various types of data from you when you use our Platform. This information is categorized as follows:

3.1 Data Linked to You

This is information that is associated with your identity:

Contact Information

- **Name:** Used for app functionality, analytics, product personalization, and advertising or marketing. (Linked to your identity)
- **Email Address:** Used for app functionality, marketing communications, and analytics. (Linked to your identity)
- **Phone Number:** Used for app functionality, marketing communications, and analytics. (Linked to your identity)
- **Physical Address:** Used for app functionality and account verification. (Linked to your identity)
- **Other User Contact Info:** May include additional contact details provided by you; used for analytics and improving app functionality. (Linked to your identity)

Financial Information

- **Payment Information:** Collected when you conduct transactions; used for processing payments and managing investment services. (Linked to your identity)
- **Sensitive Financial Information:** Collected as needed for app functionality related to transactions and investments. (Linked to your identity)

User Content

- **Photos or Videos:** Uploaded by you for product personalization or as part of user-generated content features; used to enhance your experience. (Linked to your identity)

Identifiers

- **User ID:** A unique identifier assigned to your account; used for product personalization and app functionality. (Linked to your identity)
- **Device ID:** Collected for analytics and to support app functionality and personalized user experiences.

Diagnostics

- **Crash Data:** Information on app crashes used to diagnose and improve app performance. (Linked to your identity)
- **Performance Data:** Data on app usage and performance for analytics and enhancement purposes. (Linked to your identity)
- **Other Diagnostic Data:** Additional data used for troubleshooting and improving the Platform.

3.2 Data Not Linked to You

In some instances, we also collect data that is not directly associated with your identity. This may include:

- **Sensitive Information:** Collected in aggregate or anonymized form for analytical purposes.
- **Identifiers:** Anonymous device or session identifiers that are not tied to your personal identity.
- **Diagnostics:** Aggregated diagnostic and performance data that help us improve app functionality and user experience.

Note: The data collection practices described above apply equally to users accessing our Platform via the Apple App Store and Google Play.

4. How We Use Your Information

We use the information we collect to:

4.1 Provide and Improve Our Services

- **Account Management:** Create and maintain your user account.
- **Transaction Processing:** Process payments and facilitate investment services (in partnership with Black Star Advisors).
- **Personalization:** Customize your experience through product personalization and tailored content.
- **Analytics and Research:** Analyze usage patterns to improve the Platform's functionality and design.

4.2 Communication

- **Transactional Communications:** Send you account updates, password resets, and system notifications.
- **Marketing:** With your consent, send marketing emails, texts, or other communications regarding updates, promotions, or new features.

- **Customer Support:** Use your data to provide support via customer service channels or our AI assistant, Zoe.

4.3 AI Assistant (Zoe) and Data Usage

- Zoe provides general guidance and support using non-personal, aggregated data.
- **Important:** Phundit does **not** use your personal data for training Zoe or any AI models unless you explicitly opt in.
- In the future, if an opt-in option for data sharing to improve AI functionality is offered, any shared data will be anonymized and used solely for enhancing service quality.

5. Disclosure of Your Information

5.1 Third-Party Service Providers

We may share your information with trusted third-party service providers who assist us with:

- Hosting and technical support.
- Payment processing and transaction fulfillment.
- Analytics and marketing services.

These providers are required to protect your information and use it only for the purposes specified by us.

5.2 Business Partners (Including Black Star Advisors)

- To facilitate our investment services, we share necessary transaction and account information with Black Star Advisors.
- Information shared is used solely to process investments and comply with regulatory requirements.
- All data sharing with our partners is subject to strict confidentiality obligations and applicable legal requirements.

5.3 Legal Requirements and Protection

- We may disclose your information if required by law, regulation, or legal process.
- Disclosures may also be made to protect our rights, property, or the safety of our users and the public.

5.4 Fraud Prevention

We use your data to help prevent, detect, and respond to fraudulent or unlawful activities on our Platform.

6. Data Security and Retention

6.1 Data Security

We employ industry-standard security measures, including encryption, secure servers, and regular security audits, to protect your personal data. Despite these measures, no method of transmission over the internet or electronic storage is 100% secure.

6.2 Data Retention

We retain your personal information only for as long as necessary to fulfill the purposes for which it was collected, comply with legal obligations, resolve disputes, and enforce our agreements. Once the data is no longer needed, we will take steps to delete or anonymize it.

7. Your Rights and Choices

7.1 Access, Correction, and Deletion

- You have the right to access, update, or request deletion of your personal information through your account settings.
- Requests for deletion are subject to legal or regulatory constraints, and some information may be retained as required.

7.2 Opt-Out of Marketing Communications

- You may opt out of receiving marketing communications at any time by following the unsubscribe instructions or contacting us directly.
- Essential account-related communications will continue to be sent.

7.3 Data Sharing for AI Improvement

- As noted, we do not use your personal data for training our AI assistant, Zoe, unless you explicitly opt in.
- Should we offer an opt-in program for anonymized data sharing in the future, you will have full control over your participation.

8. International Transfers

Your personal information may be transferred to and maintained on servers located outside your country of residence. We take measures to ensure that your data is protected in accordance with this Privacy Policy, regardless of where it is processed. By using our Platform, you consent to such transfers.

9. Children's Privacy

Our Platform is not directed to children under the age of 18. We do not knowingly collect personal information from individuals under 18. If we become aware of such collection, we will take steps to delete the information promptly.

10. Changes to This Privacy Policy

10.1 Right to Modify

We reserve the right to update or modify this Privacy Policy at any time. Any changes will be posted on the Platform with an updated effective date.

10.2 Notice of Changes

Material changes to this Policy will be communicated to you via the Platform or email. It is your responsibility to review the Policy periodically.

10.3 Continued Use

Your continued use of the Platform after any modifications constitutes your acceptance of the updated Privacy Policy.

11. Contact Information

If you have any questions or concerns about this Privacy Policy or our data practices, please contact us at:

- **Email:** support@phundit.app
- **Postal Address:**
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By using the Phundit Platform, you acknowledge that you have read, understood, and agree to the terms of this Privacy Policy.