# **Privacy Policy**

## July 2021

We value your privacy. With this policy, we set out your privacy rights and how we collect, use, disclose, transfer and store your personal data.

## Terms we use in this policy

When we say "Ipe Tano", "we", "our", or "us", we mean Ipe Tano (Tanzania Product Review Company Ltd) which is the entity responsible for processing your personal data. When we say "website" or "platform", we mean all of Ipe Tano's websites and applications.

## Third-party websites

Our platform contains links to other websites, but that doesn't mean we endorse those websites. We encourage you to review the privacy policies for these third-party websites because their procedures for collecting, handling and processing personal data might be different to ours.

## We're an open platform

Because we're an open platform, when you write a review, the review and your profile will be visible to anyone who visits our platform. By clicking on your profile, such visitors can see your country location and all the reviews you've written. Similarly, if you're a business user and reply to a review about your company, this will also be visible on our platform. So please remember that depending on the information you add to your Ipe Tano profile and the username you choose, you may or may not be anonymous.

### Personal data we collect

Personal data is any information that relates to an identifiable individual. When you create a Ipe Tano user account, write a review, create a business account on behalf of your company, or otherwise use our platform, we may collect and process the following personal data about you:

Contact information: Your name and email address or any other contact details you may provide to us from time to time.

Device and location information: Your IP address, browser settings (the type of browser you use, browser language, time zone), and location.

User account information: Your username, password, photo, location and preferred language.

Business account information: Your password, your company name and domain, and certain other information you choose to add to your business profile, such as details about the type of services your company offers.

Usage and profiling information: Your Ipe Tano search history, how you've interacted with our platform, including time you spend on our site, features or functions you've accessed, and links you've clicked.

Information about reviews and ratings, including:

Which business you reviewed.

Whether you wrote a service review, a location review, or a product review.

Your review content and star rating.

The location of the business you reviewed.

The dates you wrote your review, made any edits, or deleted the review.

Your reference number, order ID or similar (if you or the business provided one).

If we ask you to provide information or documentation to verify your experience, and you send us such documentation, we will collect and process the documentation for the purpose/s stated in the request.

Information about views, likes and how useful your review is for others: How many people read your review and how many people find your review "useful". We also collect information if you click "useful" on someone else's review.

Information about reports and replies to reviews from your business account: Your name, company details, the information you state in the reply to a review, which review you reported, the reason for the report, the date of the report.

Preferences information: Selected preferences associated with your account, including specific consents you have given or declined, newsletters or similar email preferences and cookies containing your preferences.

Communication information: Includes communications we receive from you such as review notifications, feedback, help requests and queries via email, and other electronic communication methods, as well as metadata associated with those communications, such as time and date.

Call recordings: All inbound and outbound telephone calls made to or by Ipe Tano may be recorded for training and quality control purposes. Personal data (for example, name and contact details) revealed during a telephone call will be digitally recorded to deliver appropriate services.

Information from other services, including social networks: You can connect your Ipe Tano profile with your social media profiles, for example, Facebook ("social network"). When you do this, we automatically collect selected information about you from your social network, depending on what information you have made available on that social network and your privacy settings for sharing such information on that social network. We may collect the following information:

Name and/or username

Email address

Profile photo

Your social connections

Before your request to connect your Ipe Tano profile with a social network profile is carried out, you'll be told which information we will collect from that social network. You can disconnect your social network profile from your Ipe Tano profile via your Ipe Tano account at any time. Ipe Tano will then remove your social network unique ID, and disconnect/revoke Ipe Tano from your social network. However, your social network profile picture will remain on your Ipe Tano profile unless you change it.

We ask you not to share any sensitive personal documents or information with us, such as information revealing ethnic origin, religious beliefs or health information.

### How we collect personal data

The personal data that we process is primarily collected directly from you when you provide your details to create an account with us or interact with our platform, such as by leaving reviews or posting replies to reviews.

Sometimes we're given information about you from third parties. For example, when you sign up for a Ipe Tano account via Facebook, your account is automatically pre-filled with the information we receive from them. Similarly, when a business asks us to send a review invitation to you on their behalf, they give us your name, email address and a reference number, such as an order ID or similar.

We also generate or collect information from your computer or device automatically as you use our services — like your IP address, your location, or information about the device and browser you're using to access Ipe Tano.

## Who is the controller of your personal data?

If you've been sent invitations to write reviews on Ipe Tano from businesses that use our services, or from us on their behalf, those businesses will be the data controllers responsible for those invitations and for any personal data associated with them. If you have any questions about such invitations or want to exercise your rights with regards to any data used in that context, please contact the relevant businesses directly, as we're unable to help.

In respect to all other personal data associated with our platform, such as information you provide when you create an account, leave a review, or submit a reply, Ipe Tano (Tanzania Product Review Company Limited) is the data controller.

Why and how we use your personal data

We'll use your personal data to:

Provide our services to you, including displaying your reviews and giving you access to your user account and our platform, or providing you with access to your company's business account and our website.

Identify you as a registered user when you log into our platform and revisit our platform.

Improve our platform and services.

Respond to your questions and provide customer service.

Send you our newsletters.

Engage in various internal business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products and services, improving or modifying our platform and our services, including our widgets, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

Train our staff and for quality control purposes, helping us improve the quality of our services.

Exercise or comply with our own legal rights or obligations in connection with legal claims, or for compliance, regulatory and auditing purposes, where necessary. For example, we may retain information where we are required by law, or if we are compelled to do so by a court order or regulatory body.

If you have a Ipe Tano user account, we'll also use your personal data to:

Verify the authenticity of your reviews.

Invite you to leave more reviews.

Pass on a message from the business you reviewed or the business that invited you to review a service experience or a product via our platform.

Contact you if your review is flagged by businesses or other users and, if necessary, ask you to provide documentation to verify your review or experience.

Inform you when other users find your review useful or otherwise provide feedback concerning your review.

Facilitate the social sharing function, including giving you the option to connect with members of your network who are both users of Ipe Tano and users of one or more social networks.

Display which members of your social networks are also users of Ipe Tano in order to increase confidence in reviews and to create a better user experience on our platform.

Enforce our Terms & Conditions.

If you have a business account on behalf of your company on Ipe Tano, we'll also use your personal data to:

Notify you about a review on your company.

Verify the legitimacy of your replies to reviews about your company.

Inform you when users provide feedback concerning your reply to a review or your report of a review about your company.

Enforce our Terms & Conditions.

We may also use the information in other ways for which we provide specific notice at the time of collection.

We need to process your personal data in order to:

Perform our contract with you or your company.

To exercise and comply with our own legal rights and obligations and operate an online review platform in compliance with applicable legal acts.

Pursue legitimate business interests related to operating our website and providing our services to you. Where we process your personal data based on a legitimate interest we will only do so where the processing is relevant, adequate and limited to what is necessary for the purpose it was collected for. And of course, we'll always ensure our legitimate interests don't unfairly impact on your own rights and freedoms.

For the establishment, exercise or defence of legal claims, where necessary.

In circumstances where you have expressly given your consent for us to process your personal data, for example, when subscribing to our newsletters or accepting certain cookies on your device, you are free to revoke your consent at any time, either by using the functionality provided within the appropriate product feature or by contacting us (see 'Contact us' below). However, please be aware that we may have the right to continue to process your information if it can be justified on one of the other legal bases mentioned above.

You have the right to object to how we process your personal data or ask us to restrict the processing. Please see 'Your rights' below, for more details.

Who may access your personal data?

Your personal data on Ipe Tano

We share your reviews on our platform so that others can read about your experience with a specific business. When you write a review, other users of our platform will be able to see your username, your location (country or region), all reviews you've written, and other information you have chosen to connect with your public profile. They can also see whether you've marked other reviews as "useful".

Remember that if you've selected to use your real name as your username, this could reveal your identity. We recommend you exercise care in deciding which information to make available on our platform, and be aware that depending on the level of information provided, you may or may not be anonymous.

If you connect to a social network, information such as your profile photo, your name, birth year and approximate location will be collected from your social network profile and used to identify you on our platform. Subject to your privacy settings and the level of information available from the social network, users of our platform can use this information to identify the reviews you have written.

If you've chosen to preserve anonymity by not using your name for your Ipe Tano username, be aware that information from social networks can reveal your identity in part or in full and make it possible to identify which reviews you have written.

We show you if your social network contacts or friends have also connected with Ipe Tano. This is only visible to you. Other people on Ipe Tano cannot see your social network connections.

Your personal data on Ipe Tano when you create a business account on behalf of your company

When you create a business account on behalf of your company, we will disclose your company name, company address, domain, country and other information you have chosen to connect with your company's public profile.

We recommend you exercise care in deciding which information to make available for disclosing on the website and be aware that depending on the level of information provided, you may or may not disclose personal data.

Other information provided by you on the website, including your replies to users' reviews about your company, are also made available for other users of the website.

Your personal data on services that you connect to your Ipe Tano user account

If you connect your Ipe Tano account with your social network profile, the information and reviews provided by you, as well as data compiled by us about your use of the platform (for example, the number of reviews you have written) will be shared with and displayed in connection with your profile on the social network and will be subject to its privacy policy.

Your personal data shared with other services, websites and businesses

One of Ipe Tano's main goals is to increase the exposure and availability of reviews. We therefore permit other services to show reviews created on our platform, including but not limited to, companies' replies to reviews created on the website. This increases the potential audience and other consumers' knowledge of Ipe Tano and the reviews.

The categories of third-party services and companies that can show your reviews together with your public user profile (or if you have a business account on Ipe Tano, your replies to reviews about your company) are:

Search engines, including Google and Bing.

Businesses you reviewed on Ipe Tano.

Businesses that invited you to review a product.

Consumer portals and business portals, including price comparison websites, shopping guides, etc.

Application partners and platforms.

Other similar websites where, in Ipe Tano's assessment, it will be relevant for users to search for reviews.

### Social networks.

If you write a review on Ipe Tano in response to an invitation sent by a business via our review invitation services, that business will be able to match your review with their invitation.

We won't share documentation you send us to verify your experience with the reviewed business. However, if you have a reference number, order ID or similar, we may pass that on to the business, unless you ask us not to. If you choose to provide information when replying to a message sent by a reviewed business using the Find Reviewer tool, this information will also be shared with the reviewed business.

### Your personal data shared with data processors

We share your personal data with selected third parties (including Ipe Tano subsidiaries and other companies within the Ipe Tano group) that provide us with a variety of different services that support the technical operation of our platform and the delivery of our services ("data processors"). These third parties are data processors for the personal data for which we are the data controller. We have data processing agreements in place with the data processors, and it follows from these agreements that they must act solely in accordance with our instructions. By accepting this policy, you authorize us to instruct the data processors to process data in accordance with this policy and for the purposes of using the platform.

The data processors have taken reasonable technical and organizational measures to protect against the information being accidentally or illegally destroyed, becoming lost or deteriorating, and to protect against the information being disclosed to unauthorized persons, being misused, or in other ways being processed in violation of data protection laws.

Some of these data processors and third-party services will be located in countries outside of the one in which you are based and may have different, or less stringent, data protection standards. However, subject to the local laws in these countries, we will ensure that necessary safeguards are in place to protect your data, regardless of location. We do this through a combination of appropriate technical, organizational and administrative security measures, and by putting in place the necessary legal contracts to back up these requirements.

#### Other disclosures

In addition to the above, we share your personal data with the following parties and in the following circumstances:

To comply with laws or to respond to claims, legal process (including but not limited to subpoenas and court orders) and requests from public and government authorities.

To cooperate with regulatory bodies and government authorities in connection with investigations or case referrals.

To third parties in connection with the enforcement of our User Terms & Conditions, Guidelines for Reviewers, Business Terms & Conditions, and Guidelines for Businesses.

To third parties in order for us to protect our operations or those of our affiliates.

To third parties to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

To third parties in order for us to pursue available remedies, or limit damages that we may sustain.

To third parties in order for us to investigate, prevent or take action regarding suspected or actual prohibited activities, including but not limited to fraud and misuse of our platform.

To third parties in the event of any reorganization, merger, acquisition, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business or assets (including in connection with any bankruptcy or similar proceedings).

How long do we store your personal data?

We only keep your data for as long as we need it or are required to for legal reasons. We'll then either delete it or anonymize it so that it doesn't identify you. We treat data differently depending on what it's used for, but you can delete your personal data or ask us to do that for you at any time (see 'Your rights' below).

Personal data you provide, including your reviews, is kept for as long as you have a Ipe Tano account, or as needed to provide you with our services. If you choose to delete your user account, we will only save a log with the following information: your name, email address and the date of the deletion of your account. We will keep the log for three years. All other information will be deleted, including your reviews.

In some cases, even if you delete your account, we retain certain information (for example, visits to our platform) in an anonymized or aggregated form.

Personal data we receive from companies that use our services to send a review invitation to you on their behalf is kept for three years.

How do we keep your personal data secure?

Keeping your personal data secure is our highest priority. We use various organizational, technical and administrative measures to protect your personal data within our organization and we regularly audit our system for vulnerabilities. However, since the internet is not a completely secure environment, we can't ensure or warrant the security of the information you transmit to us. Emails sent via the platform may not be encrypted, and we therefore advise you not to include any confidential information in your emails to us.

Do we use cookies?

We use cookies and similar technologies to help deliver, optimize, personalize and analyze our services, and for advertising purposes. We use a combination of cookies and other technologies, such as pixels and tracking codes, to collect information for use in line with the purposes set out in this policy.

### What's a cookie?

A cookie is a small text file that is stored on your computer or device, via your web browser, at the request of the websites you visit or applications you use. Cookies record things like your preferences and settings, which help give us the information we need to provide you with the most consistent and relevant experience. We also use cookies to record information about experiments or new improvements we might test to track how you use our services and find out whether they were effective.

Cookies on our website may be set by us, third parties we're working with, or independent third parties, such as advertisers.

### What are pixels?

Pixels are small, transparent image files inside a web page or email. We use them to understand how you interact with our services.

What are tracking codes?

Tracking codes are snippets of code placed in the page to measure things like visits and interactions. We use tracking codes to find out more about how you interact with our services, the adverts you see and more generally, how you use our platform.

Please see our Cookie Policy for more information and details of the types of cookies and similar technologies we use.

### Your rights

If you've got a Ipe Tano user account, you can access, edit, download or delete the key personal data associated with your profile at any time by logging into your account. From here you can also manage your subscription and marketing preferences.

You also have rights in relation to the personal data we have about you. These rights may be limited, for example, if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law, or have compelling legitimate interests, to keep. If you have unresolved concerns, you have the right to complain to a data protection authority.

### Access and download your personal data

If you have a Ipe Tano user account, you can log in to see and download information related to your account, including your reviews.

If you have a business account on Ipe Tano, or if you don't have an account at all, you can email privacy@IpeTano.com and request information about your personal data.

Correction and deletion of your personal data

If any of the personal data we have about you is incorrect or misleading, if your personal data changes or if you no longer wish to appear on the platform, you can correct, edit or delete the information yourself via your Ipe Tano user account. Otherwise, you are welcome to email privacy@IpeTano.com requesting to correct or delete your information.

If your user account is deleted, all the data associated with your account will be deleted, including your reviews.

## Other rights

In addition to the rights set out above concerning your personal data, you also have the right to object to the processing of your personal data, and the right to have the processing of your personal data restricted (in particular, where we don't have to process the data to meet a contractual or other legal requirement, for example the processing of your personal data for direct marketing purposes).

Where we have asked for your consent, you may withdraw your consent at any time. You may withdraw your consent either by using the functionality provided within the appropriate product feature or by contacting us (see 'Contact us' below). If you ask to withdraw your consent to Ipe Tano processing your data, this will not affect any processing which has already taken place at that time.

## Children's information

Our platform is not directed to children under the age of 18, and we do not knowingly collect personal data from such children. If you become aware that a child under the age of 18 has provided us with their personal data, please contact us using the contact information provided below.

### Changes to this policy

We may change this policy from time to time. Laws, regulations, and industry standards evolve, which may make those changes necessary, or we may make changes to our services or business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, we will provide additional notice, such as via email or through our platform. Your continued use of our platform or services after we publish or send a notice about the changes to the policy will mean that you accept and agree to the updated policy.

### Contact us

We aim to make this information as clear and transparent as possible. But if you still have questions about how we process your personal data, or would like to exercise your rights under our policy, you're welcome to contact our Data Protection Officer at privacy@IpeTano.com.

You can reach us by mail at:

Ipe Tano, Tanzania Product Review Limited (TPR) Dar es Salaam, Tanzania