# **PRIVACY POLICY**

#### Introduction

Welcome to Lynccup, your one stop platform to organize events and catch up on all trending events around you.

With Lynccup, Event booking has never been easier. In a digital era where users details could get into the wrong hands online, we are here to ensure all our users that we respect every users' privacy. At Lynccup, we value your privacy and we are 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 the website, the terms "we", "us" and "our" refer to Lynccup. This Privacy Policy explains how we collect, use, share and protect your personal data in connection with your relationship with us as a user or potential user. It applies to all our clients, potential clients, consultants, partners and every other person we hold information about. This policy also sets out your rights and who you may contact for further information. You agree to this Privacy Policy by visiting our website 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 website and services are not directed at you if we are prohibited by any law of any jurisdiction from making the information on our website available to you and is not intended for any use that would be contrary to local law or regulation.

#### 1. Definitions

In this document, "User Agreement", "Agreement", "Terms and Conditions of Service" are synonymous and used interchangeably. In this Agreement, "you" or "your" or "User" refers to any person or entity using the service. Unless otherwise stated, "Lynccup," "we" or "our" or "us" will refer collectively to Lynccup.

#### 2. Consent

You accept this privacy policy when you give consent upon access to our platforms, or use our services, content, features, technologies or functions offered on our website, digital platforms or visit any of our offices for official or non-official purposes.

#### 3. Information We Collect and Personal Data

There are two categories of information we collect.

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

#### **3.1. Information Collected Automatically:**

Whenever you visit our website, our web 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 website, pages viewed, information searched for, access times, and other relevant statistics.

# **3.2.** Information You Provide Us:

If you provide us with personal information, by contacting us, or subscribing to our services we collect personal information, to know how to serve you better. This may include *a Username and password, contact information; Payment information and any other information* you provide to us. This would help us know things like the nature of events you are interested in so our team can share updates with you on similar events in the future.

Your information will also be used by organizers on our platform that you register for their events. They will need these details to send you reminders about the event you registered for and also send you updates about consequent events in the future.

# 3.3. Organizers' Data

When you are signing up as an organizer, we will request for more personal and business details from you than we would from users who sign up to get tickets for events. These details would help our team verify the authenticity of you and your organization and also help us ensure that you are legally permitted to hold those events. This may include bank account or other payment account information, Tax Identification Numbers, date of birth, passport or driver's license number, country of origin, copies of government identification documents, current address, doing business as (DBA) names, description of products, website address and other personal information.

#### 3.4. General Data

At certain intervals, our research team will send out surveys to users to improve their experience on our platform. Users will be required to fill in general data and not personal details. These details are solely for research purposes and handled with utmost confidentiality.

### 4. What We do With Your Personal Information

### 4.1 Marketing Purpose

We create email marketing campaigns regularly for marketing purposes. We make use of every email in our database for this. This means if you signed up to our platform with your email address, you will receive updates in form of newsletters from our marketing team regularly sharing new features on our platforms, promos, exciting offers you can take advantage of.

### 4.2 Personalized Interest

Based on your personal interests as indicated during your sign up and kind of events you regularly like and follow on our platform, we will use this data to improve on how we regularly provide these kinds of events to you as a user. This means you will get regular notification about similar events. Also, we will send email updates to you about when such events will be coming up, details about the events interesting offers you can take advantage of.

### 4.3 Internal Research Purposes

We will use data aggregated from our users for internal research purposes regularly. Our product team will focus on using this research to discover ways to improve your experience on our platform. This means we will send in emails to get your feedback on how we can improve our platform to serve you better. We will also send in survey questions you can fill to aid our decisions and direction on knowing features to prioritize for our next product release cycle.

# 4.4 Data Usage

We primarily collect your information to ensure that we provide the most efficient service to you, monitor the use and improve our website and other legitimate interests.

Your information will solely be used and disclosed for the following purposes:

- i. To help us verify your identity;
- ii. To carry out our obligations ensuing from any contracts entered into between you and us;
- iii. To provide you with the products, services and information you request from us;
- iv. To assist you with enquiries and improve our customer service;
- v. To assist us in carrying out marketing analysis and customer profiling (including transactional information), conduct research, including creating statistical and testing information;
- vi. To allow us to communicate with you in any way (including e-mail, telephone, visit, and text or multimedia messages);
- vii. For our billing and account purposes;
- viii. To help prevent and detect fraud or loss;

- ix. To update our records;
- x. To make recommendations and suggestions to you about services offered by us unless you have previously asked us not to do so;
- xi. To send you service or support messages, such as updates, security alerts, email notifications and /or newsletters;
- xii. To conduct investigations and risk assessments; and
- xiii. For compliance with legal and regulatory obligations.

### 5. Data Storage

We retain your personal data on our platform for as long as you are on signed on as a user on our platform. We may also retain your data on our platform for few more months after you stop using our platform for the following reasons;

- Easy access upon continuation of use of services after a hiatus.
- Tax reporting reasons when we might need to present a number of users within a particular fiscal year validate existence of said users.
- Research purpose: Our product team will use some of the data provided to understand users' behaviour and how we can keep them on board for a longer period.

#### 6. Other Information We Collect

Other information which may be automatically collected from you when you visit our website 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 website, pages viewed, information searched for, access times, your geographical location, operating system, referral source, and other relevant statistics.

#### 6.1 Use of Cookies

We use cookies to identify you as a user and make your user experience easier, customize 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 website. Cookies allow our servers to remember your account log-in information when you visit our website, IP addresses, date and time of visits, monitor web traffic and prevent fraudulent activities.

If your browser or browser add-on permits, you have the choice to disable cookies on our website; however, this may limit your ability to use our website.

We have no control over our partners or affiliate platforms' cookies and therefore have no control of the kind of data they gather with their cookies.

# 7. Disclosures

- i. We will not sell, publish, or disclose to third parties your personally identifiable information collected on our website, 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 and in compliance with the Nigeria Data Protection Regulation 2019 (NDPR).
- ii. We may request and provide information about you from and to third parties to provide our services.
- iii. 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.
- iv. You have the right to request an erasure of your data at any time.
- v. We will notify you if we are transferring your data.
- vi. You may request at any time that we halt further dissemination of your data or cease to use your data.
- vii. If you submit content in a public forum or a social media post, or use a similar feature on our website, that content is publicly visible.
- viii. 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.
- ix. 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.

# 8. Updating or Deleting Your Personal Data

To delete your data permanently from our platform, you can refer to the account deletion button in the settings section. We respect each users' privacy and are willing to understand their need per time. Updating your personal data is pretty easy on our platform, all you have to do is go to settings to update your current details which will automatically be updated on our platform. For password update, we observe the standard password change protocol by sending you a link to change your password in your email. We always advise users to use strong emails and protect these sensitive information from strangers.

# 9. Transfer of Personal Data

# 9.1. Third Party Processor within Nigeria

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 Lynccup 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 the Nigeria Data Protection Regulation (NDPR).

# 9.2. Transfer of Personal Data to Foreign Country

**9.2.1.** Where your personal data is to be transferred to a country outside Nigeria, Lynccup shall put adequate measures in place to ensure the security of such data. In particular, Lynccup shall, among other things, conduct a detailed assessment of whether the said country is on the National Information Technology Development Agency (NITDA) White List of Countries with adequate data protection laws.

**9.2.2.** Transfer of your personal data out of Nigeria would be in accordance with the provisions of the NDPR. Lynccup will therefore only transfer your personal data out of Nigeria on one of the following conditions:

- a. Your explicit consent has been obtained;
- b. The transfer is necessary for the performance of a contract between you and Lynccup;

c. The transfer is necessary to conclude a contract between Lynccup and a third party in your interest;

d. The transfer is necessary for reason of public interest;

e. The transfer is for the establishment, exercise or defense of legal claims;

f. The transfer is necessary in order to protect your vital interests or the interests of other persons, where you are physically or legally incapable of giving consent.

**9.3**. Provided, in all circumstances, that you have been manifestly made to understand through clear warnings of the specific principle(s) of data protection that are likely to be violated in the event of transfer to a third country, this provision shall not apply to any instance where you are answerable in duly established legal action for any civil or criminal claim in another country.

**9.4.** We will take all necessary steps to ensure that your personal data is transmitted in a safe and secure manner. Details of the protection given to your information when it is transferred outside Nigeria shall be provided to you upon request.

**9.5.** Where the recipient country is not on the White List and none of the conditions stipulated in clause 9.2.2 of this policy is met, Lynccup will engage with NITDA and the Office of the Honourable Attorney General of the Federation (HAGF) for approval with respect to such transfer.

### 10. Users' Rights

Subject to certain limitations and exceptions, you are entitled to the following principal rights under the Nigeria Data Protection Regulation (NDPR):

- i. You have the right to be notified if we are transferring your personal information.
- ii. You have the right to request an erasure of your personal information at any time.
- iii. You have the right to request that we rectify inaccurate personal information.
- iv. You may request at any time that we halt further dissemination of your data or cease to use your personal information.
- v. You have the right to request for copies of your personal information.

# 11. Security

We prioritize securing your private data from unauthorized users or hackers who carry out phishing activities to crawl users' data from online platforms and applications. To keep your data we have a secured socket layer (SSL) certificate for our application. This prevents unauthorized users and web crawlers.

# **12.** Data Confidentiality Right

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 the Freedom of Information Act and other relevant enactments.

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 Lynccup.

# **13.** Data Breach Management Procedure

- i. 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:
- ii. notify you within 24 hours of the occurrence of the data breach;
- iii. properly investigate the breach and take the necessary steps to mitigate such breach;
- iv. identify remediation requirements and track the resolution of such breach; and
- v. notify National Information Technology Development Agency (NITDA) or any other regulatory authority, where necessary.

### 14. Links to Third Party Websites/Services

- i. Our website/app may contain links to third-party websites or services that are not owned or controlled by us.
- ii. We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third-party websites 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 websites or services.
- iii. We strongly advise you to read the terms and conditions and privacy policies of any thirdparty websites or services that you visit.

# **15.** Limitation of Liability

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

# **16.** Changes to Privacy Policy

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

# 17. Contact Us

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