# **Privacy Policy**

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING OUR WEBSITES OR SERVICES. BY ACCESSING OR USING OUR WEBSITE OR OUR SERVICES (OTHER THAN TO READ THIS PRIVACY POLICY FOR THE FIRST TIME), YOU AGREE TO THIS PRIVACY POLICY.

## Introduction

This Privacy Policy tells you the types of information we collect when you use our Sites or Services, how we use that information, and the instances in which we share your information.

Summary of key principles

We thought it would be helpful to set out briefly the key ways in which we use your information and how we seek to protect privacy. Of course, we would be delighted if you read our full privacy policy.

We typically collect two kinds of information about you: (a) information that you provide that personally identifies you (e.g., full name or phone number); and (b) information that does not personally identify you (e.g., your IP address or type of browser);

This information is transmitted to, held and processed by us in Uganda.

We typically use this information to provide you with our website and related services, to deliver targeted advertising based on your preferences and our promotions to you and to produce reports and data about online shopping;

We may disclose this information to authorized third parties including, advertising and promotional partners and third party service providers for these purposes;

You may at any time opt-out of certain activities as set out below (see section VI);

Our websites use "cookies" although you can set your browser not to accept cookies if you so wish although this may affect your use of our websites;

We encrypt any information you input using Secure Sockets Layer (SSL) software and take security measures to safeguard information in accordance with industry practice;

If you register with us, you have the ability to update or correct the information you previously provided via the account section;

If you have any questions or concerns about privacy, please contact us;

Our websites and our services are not designed or intended for use by children under 13; and

This Privacy Policy may change from time to time so please check this policy regularly. Any material changes will be notified to you by email as appropriate.

## I. What information do we collect?

We collect two kinds of information related to you: (a) Personally Identifiable Information ("PII"); and (b) Non-Personally Identifiable Information ("Non-PII").

- (a) Personally Identifiable Information: PII includes any information that identifies you as person. We collect your PII when you choose to register with us or when you choose to participate in an interactive feature of our Sites such as our blogs, surveys, reviews, promotions, newsletters, panels, communities, free prize draws and competitions. You may: (a) provide your name, mail/shipping address, email address, credit card number and phone number when registering with our Sites or in connection with a contest entry; (b) provide certain demographic information about you (e.g., age, gender, shopping interests and preferences, etc.) when participating in a survey or poll; or (c) post a general comment and/or recommendation on our Sites.
- (b) Non-Personally Identifiable Information: Non-PII is any information that does not identify you as a person including PII which has been rendered anonymous. We obtain non-PII either separately or together with your PII as described above. We collect certain non-PII from you when you access our Sites including IP addresses and information relating to your browser, operating system, ISP, the third party website from which your visit originated and how you use our Sites such as the web pages you visit, and the duration of your visits.

#### II. How we use & share the information collected

PII and Non-PII is used to provide, or improve, our Sites and Services to you and to carry out your requests, respond to your inquiries, better serve you and understand your needs, or is used in other ways naturally associated with the circumstances in which you provided the information. We may disclose PII and Non-PII to:

Our third party service providers who perform functions on our behalf in connection with the operation of the Sites or Services e.g., providers who host and manage data, process credit card orders, deliver our merchandise, etc;

Participating sponsors to a program or promotion you enter through our Sites or Services; Our parent company, subsidiaries or other affiliated companies ("affiliated companies") for operational, marketing and promotional purposes;

Co-promotional partners and others with whom we have marketing or other relationships; Participating merchants where you consent at the time you submit PII to us when using the interactive features of our Sites such as surveys and reviews concerning our participating merchants; and

Our other users where you choose to publicly post reviews, comments or other information relating to products or services, communicate with other users via public forums (e.g., forums, message boards, bulletin boards, etc.).

In addition, we use non-PII to help analyse site traffic, understand customer needs and trends, carry out targeted promotional activities (see "Preference Based Advertising" below). We may use your non-PII by itself or aggregate it with information we have obtained from others to produce

research reports and other information and data about online shopping for participating merchants and other customers, as well as media and other interested parties.

# III. Cookies and preference based advertising

- (a) Cookies and Web Beacons: We automatically receive and store certain types of non-PII whenever you interact with us by using "cookies" and analogous technology. "Cookies" are small files that we place on your computer or your Web browser memory to enable our systems to recognise your browser and to provide convenience and other features to you. It is important to note that the cookies that we use do not contain and are not tied to PII about you. You may be able to direct your internet browser not to allow cookies and you can delete existing cookies from your computer. Please note, however, some elements of our Sites will not function properly or be available to you.
- (b) Preference Based Advertising: We work with third parties, including advertising companies and website analysis firms, who use cookies to collect non-PII when you visit our Sites and third party sites about your surfing activities. This non-PII, collected through cookies, is typically used by these third party advertising networks to: (a) serve you with advertisements, while on our Sites and third party sites tailored to meet your preferences and likely interests; or (b) conduct market research and website analysis. If you do not wish to participate in this activity, please click here and follow the simple opt-out process.

A couple of important notes about this opt-out tool: (1) it includes all the advertising networks that we work with, but also many that we do not work with; and (2) it relies on cookies to ensure that a given advertising network does not collect information about you ("Opt-out Cookies") – for a general explanation of how Opt-out Cookies work, please click here. Therefore, if you buy a new computer, change web browsers or delete these Opt-out Cookies from your computer, you will need to perform the opt-out task again.

## IV. Sale of business and disclosure by law

Business Transactions: We may disclose PII and Non-PII held by us: (a) to a prospective seller or actual seller of any business or assets we acquire; (b) if all or any of our assets are acquired by a third party, in which case, PII and Non-PII may be one of the transferred assets.

Required disclosures: We may disclose and use any PII or non-PII if we are required to do so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a) fulfil a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Sites, or other users; or (d) in an emergency to protect the health and safety of our Sites' users or the general public.

## V. Security of information

We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input. We also use a secure server hosting location in the US, firewall protection, controlled access and encryption technology to protect your data. Please be advised, however, that while we strive to protect your PII, we cannot guarantee or

warrant the security of any information you disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your PII.

# VI. Your options & opt-outs

What Information Can I Access? If you register as a member, you will typically have access to an account section that includes the registration information you previously provided which you can update or correct at any time. If there is any inaccurate information that you are not able to correct, just let us know. Also, if you wish, you can delete your membership account entirely although we may retain certain information in limited circumstances – e.g., to resolve disputes, troubleshoot problems and enforce our Terms of Use. Furthermore, some information is never completely removed from our databases due to technical (e.g., information that is stored in our "back-up" systems) and certain legal constraints.

What Choices Do I Have (Opt-Out)? You have many choices regarding how we use information about you, including: (1) To stop our emails, please contact us (2) To opt-out of third party advertising, click here; (3) To stop the sharing of PII with our participating merchants, please contact us; and (4) as discussed above, the choices we offer you anytime you submit information through our Sites or Services.

You May Contact Us With Questions: If you have any questions or concerns about privacy, please contact us.

VII. Children

As our Sites nor our Services are not intended for use by children under 13, Children under 13 may not submit any PII to us. Also, if you are under 18, you should use only submit information with involvement of a parent or guardian.

## VIII. Revisions

This Privacy Policy may change from time to time to reflect our changing business practices. We will provide you notice of any such changes by posting the new policy on our Sites or by email if the changes are material.