

Drop2Go Privacy Policy

At DROP2GO we respect your privacy and is committed to protecting your Personal Data. This policy ("Policy") explains how we process Personal Data and tells you more about your privacy rights and how the law protects you (as a data subject).

It is important that you read this Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your information.

Reference to "consent", "your consent" or "your explicit consent" shall include the ticking of a tick box or clicking on a "submit" button or "I agree" button or "send" button or sending a reply by email after we have made available our Privacy Policy to you.

1) IMPORTANT INFORMATION AND WHO WE ARE

a) Data Controller

i) TSR Software Limited as the owner of Drop2Go is a Data Controller when engaging with you as a potential customer / client or registered user of our website and other social media sites ("Sites") or our Drop2Go Application ("APP"), and responsible for your Personal Data (also referred to as "DROP2GO", "we", "us" or "our" in this Privacy Policy).

ii) Authorised Resellers:

- Where you engage directly with any of our authorised resellers and processing takes place in the country of the reseller, **the privacy policy of the reseller will apply**. Where Processing takes place at the reseller or any of their appointed third party service providers we will only act as Data Controller for the Personal Data of the customer that has signed up for the Services, however we will not act as a Data Controller for the processing of end user or courier service providers Personal Data processed in the reseller's country.
- Where the Reseller requires us to process any Personal Data on their behalf we will then only act as Data Processor.

b) Contact details

- i) If you have any questions about this Policy or our privacy practices, please contact us at: info@drop2go.com.
- ii) You have the right to make a complaint at any time to the Information Commissioner's office (IC). **We would, however, appreciate the chance to deal with your concerns before you approach the IC so please contact us in the first instance.**

c) Changes to the Policy and your duty to inform us of changes

- i) We keep our Policy under regular review. This version was last updated as per the date in the footer. Archived versions can be obtained by contacting us. Any changes made to our Policy in future will be posted on our website. The new version will apply the moment it is published on our website.
- ii) It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

d) Integration into other sites: This Privacy Policy applies to DROP2GO Services only. We do not exercise control over the sites who provide DROP2GO Services as part of their own offering (including our authorised resellers/distributors). These other sites may place their own cookies or other files on your computer, collect data or solicit Personal Data from you. We cannot be held responsible for any wrongful handling of end users' information by our customers.

e) Third-party links: Our Sites may include links to Third-Party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. If you disclose your Personal Data to a Third-Party, such as an entity which operates a website linked to this website or our social media sites, **WE WILL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD-PARTY.** This is because we do not regulate or control how that Third-Party uses your Personal Data. You should always ensure that you read the privacy policy of any Third-Party. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2) THE DATA WE COLLECT ABOUT YOU

a) Personal Data means the information as per the Definitions. Personal Data does not include data where the identity of the data subject has been removed (anonymous data).

b) We may Process different kinds of Personal Data about you when we engage with you, which we have grouped together. Should you decide to register as a user on the Drop2Go Platform, we may require you to provide us with Personal Data which includes, but is not limited to, the following:

i) Identity Data includes first name, last name, username or similar identifier, title, date of birth and gender.

ii) Contact Data includes billing address, delivery address, email address and telephone numbers.

iii) Financial Data includes banking details and credit information.

iv) Special Personal Data includes religious, biometric and health information.

v) Transaction Data includes details about payments to and from you and other details of Services you have acquired from us or accessed on our website.

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- vi) **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- vii) **Profile Data** includes your username and password, Services accessed, your interests, preferences, feedback and survey responses.
- viii) **Usage Data** includes information about how you use our website and Services. This information shall include the full Uniform Resource Locators (URL) Clickstream to, through and from our website (including the date and time) and the Services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page and any phone number used to call us/ our customer service number, service transaction instructions from and to you via our APIs.
- ix) **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- c) We also collect, use and share aggregated data and pattern data such as (but not limited to) statistical or demographic data or service transactional data for any purpose (**Aggregated Data**). Aggregated Data or pattern data could be derived from your Personal Data but is not considered Personal Data in law as this data will **not** directly or indirectly reveal your (the data subject's) identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or executing a specific transaction type (where applicable). However, if we combine or connect Aggregated Data or pattern data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.
- d) We do not collect any **Special Personal Data** about you.
- e) This website is not intended for children and we do not knowingly collect data relating to children.
- f) You may choose to provide additional Personal Data to us, in which event you agree to provide accurate and current information, and not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything.
- g) **Submission of Personal Data on behalf of another:** If you provide information on behalf of someone else, then it is your responsibility to obtain the necessary consent from the person/ User before making the Personal Data available to us. On receipt of Personal Data we assume that the necessary consent has been obtained and will process the Personal Data as per your instructions. By submitting such Personal Data on behalf of another person/ User, you indemnify us against any third-party claim, where such third-party claim relates to Personal Data that has been processed without the necessary consent or other available exception allowed by law.
- h) **If you fail to provide Personal Data:** Where we need to collect Personal Data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with Services (including Services for no charge)). In this case, we may have to cancel a Service you have with us, but we will notify you if this is the case at the time.

3) HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- a) **Direct interactions.** You may give us or our authorised resellers your identity and contact information by filling in forms or by corresponding with us by phone, email or otherwise. This includes Personal Data you provide directly to us when you apply for our Services or engage with us when you:
 - i) create an account/online Profile/ register with us (directly or via our resellers);
 - ii) subscribe to our newsletter or blog (if any);
 - iii) engage with us via Zoom, Skype or any other Video conferencing facility;
 - iv) access any of our facilities/offices;
 - v) apply / sign up for any of our Services (subject to the specific service terms and conditions);
 - vi) completion of a COVID19 questionnaire;
 - vii) request marketing material/communications to be sent to you;
 - viii) give us feedback; or
 - ix) contact us via our contact form, WhatsApp or other social media sites messaging platforms we may subscribe to.
- b) **Automated technologies or interactions.** As you interact with our Services or Sites, we will automatically collect Technical Data about your equipment/device(s), browsing actions and patterns. We collect this Personal Data by using cookies (see section 4) below), server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- c) **Third parties or publicly available sources.** We will receive Personal Data about you from various third parties and public sources as set out below:
 - i) Technical Data from the following parties:
 - analytics providers such as Google ("How Google uses information from sites or apps that use our services", (located at <https://policies.google.com/technologies/partner-sites>);
 - advertising networks; and
 - search information providers.

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- ii) Contact, Financial and Transaction Data from providers of technical, payment and delivery services (where applicable).
 - iii) Identity and Contact Data from publicly available sources such as CIPC.
- d) When using Drop2Go Services embedded in another site, certain disclosures must be given to and consent obtained from end-users. It is our intent to provide clear and comprehensive information about this site's policies and require that any party that intends to embed our Services into any other site has to first obtain written consent, which consent shall be subject to our policies as well as terms and conditions.
- e) Where any DROP2GO authorised reseller is utilised Drop2Go will conclude a reseller agreement with the reseller to confirm the reseller's obligations in terms of processing of Personal Data similar to this Privacy Policy, which Privacy Policy will also be presented to you.

4) COOKIES

- a) Our Sites make use of cookies to help us understand our users better. Cookies are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. Cookies do not harm your computer or any files on your computer. Depending on the type of cookie we use, cookies also allow us to make our websites more user friendly.
- b) DROP2GO may use third party vendors, including but not limited to Google and MSN/ Bing to show DROP2GO -related ads on sites on the internet. Third party vendors use cookies to serve ads based on a user's prior visits to Our sites or other websites. Users may opt-out of Google's use of cookies by visiting the Google Advertising Settings Page or the Network Advertising Initiative's opt-out page for other third-party vendors' use of cookies.
- c) You should be able to adjust your browser so that your computer does not accept cookies. If you do this, you will still be able to browse the website but the functions that allow you to access an existing account or page that requires a username or password will not be available.
- d) You can, alternatively, adjust your browser to notify you when a website attempts to put a cookie on your computer. How you adjust your browser to stop it accepting, or to notify you of, cookies will depend on the type of internet browser programme your computer uses.
- e) Please remember, cookies do not contain Identity, Contacts, Financial Information. We do not exchange cookies with any third-party websites or external data suppliers.

5) HOW WE USE YOUR PERSONAL DATA

- a) We will not sell your Personal Data.
- b) We will only use your Personal Data within the framework of the law. Most commonly, we will use your Personal Data in the following circumstances:
- i) Where you have given us your Consent; or
 - ii) Where we need to perform the contract we are about to enter into or have entered into with you; or
 - iii) Where it is necessary for the protection of the Data Subject's legitimate interest;
 - iv) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
 - v) Where we need to comply with a legal obligation.
- c) Generally, we do not rely on Consent only as a legal basis for processing your Personal Data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.
- d) **Purposes for which we will use your Personal Data**
- i) We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
 - ii) Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out in the table below.

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Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest	
To receive DROPS2GO newsletters / communication as customer To sign you up for our newsletter where you're not a customer of DROPS2GO yet	Identity Contact,	Existing customer (as per DPA) of DROPS2GO Your Consent	
To register you as a new user (Courier or Retailer)	(a) Identity (b) Contact (c) Financial	Consent Performance of a contract with you (including the browse wrap agreement (Terms of Use of our website)). You can only acquire Services if you register as a user on our website.	
To perform as per our Terms of Services	a) Identity (b) Contact (c) Financial (d) Transaction (e)Marketing and Communications	(a) Consent (b) Performance of a contract with you (c) Necessary for the protection of a legitimate interest of Drop2Go or any person in receipt of the Personal Data	
To perform (on behalf of either the Retailer/Requester or the Courier) in accordance with our Service Agreement and/or to process the applicable Services, including:	(a) Initial engagement: Assist Retailer/Requester and Courier to engage with each other on selection of services	(a) Identity (b) Contact	(a) Performance of the Service Agreement, on behalf of the Courier and Retailer (b) Consent of Courier and Retailer
	(b) Following engagements: Submit instructions between the Retailer/Requester and the Courier for performance of the Service Agreement	(a) Identity of end user (b) Contact details of end user (c) Location provided by end user for delivery (c) Financial (d) Transaction	(a) Performance of the Service Agreement, on behalf of the Courier and Retailer (b) Consent of end user and Retailer
	(c) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction (e)Marketing and Communications	(a) Performance of the Service Agreement, on behalf of the Courier and Retailer (b) Necessary for our legitimate interests (to recover debts due to us or other users as agreed to under our Terms of Service)
	(d) Collect and recover money owed to the Courier and DROPS2GO and its reseller	(a) Identity (b) Contact (c) Financial (d) Transaction (e)Marketing and Communications	(a) Performance of the Service Agreement, on behalf of the Courier and Retailer (b) Necessary for our legitimate interests (to recover debts due to us or other users as agreed to under our Terms of Service) [TAKE NOTE: we do not store Financial Information (card details – we use Third-Party service providers to execute transactions where you use your card. You should read their privacy policy)]
To manage our relationship with you as a user which will include: (a) Notifying you about changes to our Terms or Privacy Policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers/users use our Services)	
To reply to your submission via our "Contact-Us" page.	Identity Contact Details	Consent	
To follow our COVID19 protocol and determine whether you can be allowed on to our premises	(a) Identity (b) Contact (c) Special Personal Data	Consent; Necessary to comply with a legal obligation Necessary for our legitimate interests and the interest of other persons on the premises Required by law	
To enable you to partake in a prize draw, competition, promotion or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e)Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)	
To administer and protect our business and this website and other electronic platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation	

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To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our Services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our Services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about Services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our Services and grow our business) Existing customer: customer as per DPA Potential customer: Consent

e) Marketing: We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising.

i) Promotional offers from us

• **As a Customer:**

- (a) Once you have utilized any of our Services (including registration to the Drop2Go Platform), we will deal with you as a customer of Drop2Go as under the DPA;
- (b) As a customer we will use your Personal Data to submit to you information/material of our other Services that are related and that we feel may be of interest to you.
- (c) Important: you may ask us on submission of your Personal Data not to send you the above-mentioned information. At any time subsequent to our initial engagement you can make use of the opting out options under par. 5)iii) below.

• **Not a customer of DROP2GO yet:**

- (a) We may collect through one of our employees or through our mailing system your email address; however
- (b) Before we use same for any direct marketing purposes we will ask you for Consent (opt-in) prior to sending you direct marketing material.

ii) Third-party marketing

- We will get your express opt-in Consent before we share your Personal Data with any third party for marketing purposes.
- **TAKE NOTE:** We may provide (without your consent) third party marketing parties/advertisers with anonymous aggregate information (Aggregate Data (see above)) about our users (for example, we may inform them that 500 men aged under 30 have clicked on a specific product or advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in a specific region). We may make use of the Personal Data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience. **IMPORTANT: We do not disclose information about identifiable individuals to our advertisers.**

iii) Opting out

- You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and updating your profile as a registered user or by using the unsubscribe function on our direct marketing communications or by contacting us at any time on: unsubscribe@drop2go.com and requesting to opt-out of our marketing services.
- Where you opt out of receiving these marketing communications and messages, this will not apply to Personal Data provided to us because of a Service purchase, Service experience or other transactions.

iv) Cookies: You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

f) Change of purpose

- i)** We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
- ii)** If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- iii)** Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6) DISCLOSURES OF YOUR PERSONAL DATA

a) We may share your Personal Data with the parties set out below for the purposes set out in the table above.

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- i) **Internal Third Parties** as set out in the *Definitions*. Where we share your Personal Data to our group (including franchisees, collaborating companies/partners/agents), we ensure your Personal Data is protected by requiring all our group companies (or franchisees) and collaborating companies to follow this Policy when processing your Personal Data.
 - ii) **External third parties** as set out in the *Definitions*, to those external parties as per your instructions. Drop2Go only shares Personal Data with other companies or individuals outside of Drop2Go in the following circumstances:
 - We have your consent. We require opt-in for the sharing of any Special Personal Data (where applicable).
 - We may provide such information to collaborating companies or other trusted businesses or persons for the purpose of processing Personal Data on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
 - We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to:
 - (a) satisfy any applicable law, regulation, legal process or enforceable governmental request;
 - (b) enforce applicable Terms of Use, including investigation of potential violations thereof;
 - (c) detect, prevent, or otherwise address fraud, security or technical issues; or
 - protect against imminent harm to the rights, property or safety of Drop2Go, its users or the public as required or permitted by law.
 - iii) Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this Privacy Policy.
- b) We require all third parties to respect the security of the Personal Data we make available to them and to treat it in accordance with the law. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
 - c) We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

7) INTERNATIONAL TRANSFERS

- a) Some of our External Third Parties may be based outside the Republic of Seychelles so their processing of your Personal Data could involve a transfer of data outside the Republic of Seychelles.
- b) Whenever we transfer your Personal Data out of the Republic of Seychelles, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - i) We will only transfer your Personal Data to countries that have been deemed to provide a similar level of protection for Personal Data as the Republic of Seychelles.
 - ii) Where we use certain service providers, we conclude an agreement with them to confirm that your Personal Data is confidential, they can only process on our instructions and that they should establish and maintain appropriate technological and organizational measurements to protect your Personal Data.
 - iii) Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide protection to Personal Data similar to the conditions under the DPA.
- c) By submitting your Personal Data to us you consent to the transfer of Personal Data outside the borders of the RSA (when required).

8) DATA SECURITY

- a) We have put in place appropriate technological and organizational measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.
- b) Where required by law we will notify you and any applicable regulator of a breach where we are legally required to do so.

9) DATA RETENTION

How long will you use my Personal Data for?

- a) We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- b) To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

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- c) By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for five years after they cease being customers for tax purposes.
- d) In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.
- e) In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10) RECORDS

We will keep detailed, accurate and up-to-date written records regarding any Processing of Personal Data it carries out, including but not limited to, the access, control and security of the Personal Data and approved subcontractors, the processing purposes, categories of processing, any transfers of Personal Data to a third country and related safeguards, the instructions as received from our customers and a general description of the technical and organisational security measures and retention and destruction of Personal Data.

11) SOCIAL MEDIA

- a) Our website(s) or Services may, in certain circumstances, provide you with social plug-ins from various social media networks. If you choose to interact with a social network such as Facebook or Twitter (for example by registering an account or clicking on the link/icon on our website), your activity on our websites will also be made available to that social network. This is necessary for the performance of your contract with us which allows you to interact with a social network. If you are logged in on one of these social networks during your visit to one of our websites or are interacting with one of the social plug-ins, the social network might add this information to your respective profile on this network based on your privacy settings. If you would like to prevent this type of information transfer, please log out of your social network account before you enter one of our websites, or change the necessary privacy settings, where possible.
- b) Communication, engagement and actions taken through external social media networks that we participate in are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.
- c) You are advised to use social media networks wisely and communicate/engage with them with due care and caution in regard to their own privacy policies (if any). **PLEASE NOTE: WE WILL NEVER ASK FOR PERSONAL OR SENSITIVE INFORMATION THROUGH SOCIAL MEDIA NETWORKS AND ENCOURAGE USERS, WISHING TO DISCUSS SENSITIVE DETAILS OR TO RESOLVE ISSUES/CONCERNS, TO CONTACT US THROUGH PRIMARY COMMUNICATION CHANNELS SUCH AS BY TELEPHONE OR EMAIL.**
- d) Our social media network page(s) may share web links to relevant web pages. By default some social media platforms shorten lengthy URL's. You are advised to exercise caution and due care before clicking on any shortened URL's published on social media platforms by this website. Despite our best efforts to ensure that only genuine URL's are published many social media platforms are prone to spam and hacking and therefore our website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

12) YOUR LEGAL RIGHTS

- a) Under certain circumstances, you have the following rights under data protection laws in relation to your Personal Data:
 - i) **Request access** to Personal Data (commonly known as a "data subject access request"). There may be a fee associated with this request. This enables you to receive a copy of the Personal Data we may hold about you and that you are entitled to obtain and to verify whether we are lawfully processing it.
 - ii) **Request correction** of Personal Data. This enables you to have any incomplete or inaccurate data we may hold about you corrected, though we may need to verify the accuracy of the new data you provides to us.
 - iii) **Request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. Further Take Note: Erasure of your Personal Data shall further not limit our rights in terms of Aggregate Data and Pattern Data.
 - iv) **Object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
 - v) **Request restriction of processing** of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.

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- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
 - vi) **Request the transfer** of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Kindly contact us should you need to transfer your Personal Data.
 - vii) **Withdraw consent at any time** where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- b) **If you wish to exercise any of the rights set out above, please contact our Information Officer at the details mentioned 1)b) above.**
- c) **Fee required:** You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
- d) **What we may need from you:** We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- e) **Time limit to respond:** We try to respond to all legitimate requests within 30 (thirty) days. Occasionally it could take us longer than 30 (thirty) days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

13) SUBCONTRACTORS

- a) We may authorise a third party (subcontractor) to Process the Personal Data on our behalf. Were we uses sub-contractors, we will:
- i) enter into a written contract with the subcontractor that contains terms substantially the same as those set out in this Privacy Policy, in particular, in relation to requiring appropriate technical and organisational data security measures; and
 - ii) maintain control over all Personal Data it entrusts to the subcontractor.
- b) We agree to select subcontractors carefully according to their suitability and reliability.
- c) A subcontractor within the meaning of this Privacy Policy shall not exist if we commission third parties with additional services, that are not an essential part of this Privacy Policy.
- d) Where the subcontractor fails to fulfil its obligations under such written agreement, we remain fully liable to you for the subcontractor's performance of its agreement obligations.
- e) The Parties consider DROP2GO to control any Personal Data controlled by or in the possession of its subcontractors.
- f) We undertake to ensure that all subcontractors who process Personal Data of Data Subjects shall not amend, modify, merge or combine such Personal Data and Process same as per our instructions.

14) DEFINITIONS

- a) **Consent:** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Data.
- b) **Courier** means users who have registered for our Services and makes available their delivery/courier services to Retailers as per the Service Agreement..
- c) **Data Processor** means a person as defined under the DPA;
- d) **Data Subject** means the person to whom Personal Data relates and, in this document, refers to you ("**Couriers**" and "**Retailers**"), as the party providing Personal Data that will be processed by DROP2GO or its authorised reseller or a relevant third party.
- e) **DPA** means the Data Protection Act of 2002 (Act 9 of 2003) (as amended).
- f) **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best Service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- g) **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- h) **Personal Data** means information as defined under the DPA.
- i) **Profile** means Couriers and Retailers who have submitted the required information on our website to become registered users authorised to access our Services and conclude a Service Level Agreement with each other.

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- j) **Data Controller** means a public or private body or any other person which, alone or in conjunction with others, determines the purpose of and means for processing Personal Data.
- k) **Retailer or Requester** means users who have registered for our Services and wish to deliver retail goods/products to end users who have purchased them, by making use of the Couriers as agreed to under a Services Agreement.
- l) **Services** means the provision of our online marketplace platform to registered users which allows us to facilitate Couriers and Retailers, amongst other things, to negotiate, conclude and access Service Agreements on our website.
- m) **Service Agreement:** agreement between the Retailer and the Courier for delivery of goods/products to end users of the Retailer;
- n) **Special Personal Data** means information as defined under section 26 of the DPA (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and biometric information or criminal convictions and offences).
- o) **THIRD PARTIES**
 - i) **Internal Third Parties:** Other divisions within DROP2GO, Partners, affiliates, employees, shareholders, directors and/or agents or resellers of DROP2GO (if applicable), acting as joint Data Controllers or Data Processors and who may also provide IT and system administration services and undertake leadership reporting.
 - ii) **External Third Parties**
 - Service providers acting as operators who provide IT and system administration services.
 - Professional advisers acting as operators or joint Responsible Parties, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
 - The Republic of Seychelles Revenue Services, regulators and other authorities acting as operators or joint Responsible Parties based in the Republic of Seychelles who require reporting of processing activities in certain circumstances.
 - Court of law or any other authority where we have an obligation under law to share your Personal Data;
 - In the event that we sell or buy any business or assets, in which case we may disclose your Personal Data to the prospective seller or buyer of such business or assets.
 - Either the Retailer or the Courier (depending on who you are) to enable the recipient to perform as per the Service Agreement.