

WAKILIAPP PRIVACY POLICY

Introduction

We are committed to keep our users information safe. When you use WakiliApp, you trust us with your information.

This policy describes the information we collect, how it is used and shared, and your choices regarding this information.

Data Collections and

UsesScope

SUMMARY

This policy applies to users of WakiliApp's services in the United Republic of Tanzania (hereinafter referred as Tanzania), including users of WakiliApp's apps, websites, features or other services.

This policy describes how WakiliApp and its affiliates collect and use personal information to provide our services. This policy applies to all users of our apps, websites, features or other services. This policy specifically applies to:

- **Users:** users who request or receive various legal services
- **Advocates:** users who provide legal and consulting services individually or through partner lawfirms

This policy also applies to those who provide information to WakiliApp in connection with an application to use our services, or whose information WakiliApp otherwise receives in connection with its services. All those subject to this policy are referred to as "users" for purposes of this policy.

Data Controller

SUMMARY

WakiliApp provides services to users throughout Tanzania. If you use our services in Tanzania or elsewhere, WakiliApp is the data controller for your information.

We process personal information inside and outside of Tanzania.

Questions, comments and complaints about WakiliApp's data practices can be submitted to WakiliApp's help center via email to helpdesk info@wakiliapp.co.tz support@wakiliapp.co.tz

We process personal information inside and outside of Tanzania. WakiliApp transfers information of users' outside Tanzania on the basis of mechanisms approved under applicable law

The Information We Collect

SUMMARY

WakiliApp collects:

- Information that you provide to WakiliApp, such as when you create your WakiliApp account.
- Information created when you use our services, such as location, usage and device information.
- Information from other sources, such as WakiliApp partners and third parties that use WakiliApp APIs.

The following information is collected by or on behalf of WakiliApp:

1. Information you provide

This may include:

- **User profile:** We collect information when you create or update your WakiliApp account. This may include your name, email, phone number, login name and password, address, advocate's roll number, or banking/mobile network payment information (including related payment verification information), government identification numbers such as National Identity card (NIDA), voter registration card, driver's license or passport if required by law, birth date, photo and signature. This also includes Advocate's practicing and notarial certificate and registration information. This also includes the preferences and settings that you enable for your WakiliApp account.
- **Background check information:** We may collect background check information if you sign up to use WakiliApp's services as an Advocate or customer. This may include information such as your professional history, good standing certificate or criminal record (where permitted by law). This information may be collected by a vendor on WakiliApp's behalf.
- **Demographic data:** We may collect demographic information about

you, including through user feedbacks. In some countries, we may also receive demographic information about you from third parties.

- **User content:** We may collect information that you submit when you contact WakiliApp customer support, provide ratings or compliments for other users, or otherwise contact WakiliApp.

2. Information created when you use our services

This may include:

- **Location Information**

Depending on the WakiliApp services that you use, and your app settings or device permissions, we may collect your precise or approximate location information as determined through data such as GPS, and IP address.

- If you are an Advocate, WakiliApp collects location information when the WakiliApp is running in the foreground (app open and on-screen) or background (app open but not on screen) of your device.
- If you are a user and have provided permission for the processing of location data, WakiliApp collects location information when the WakiliApp is running in the foreground. In certain regions, WakiliApp also collects this information when the WakiliApp is running in the background of your device.
- Users may use the WakiliApp without enabling WakiliApp to collect their location information. However, this may affect the functionality available on your WakiliApp. For example, if you do not enable WakiliApp to collect your location information, you will have to manually enter your location.

- **Transaction Information**

We collect transaction details related to your use of our services, including the type of services you requested or provided, your brief details, legal matter information, date and time the service was provided, amount charged, length of video call, and payment method.

- **Usage information**

We collect information about how you interact with our services. This includes information such as access dates and times, app features or pages viewed, app crashes and other system activity, type of browser, and third-party sites or service you were using before interacting with our services. In some cases, we collect this information through cookies, and similar technologies that create and maintain unique

identifiers. To learn more about these technologies, please see our Cookie Statement.

- **Device Information**

We may collect information about the devices you use to access our services, including the hardware models, device IP address, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information, and mobile network information.

- **Communications data**

We enable users to communicate with each other and WakiliApp through the WakiliApp's apps, websites, and other services. For example, we enable Advocates and Users (customers) to call or text each other. To provide this service, WakiliApp receives some information regarding the calls or texts, including the date and time of the call/text, and the content of the communications. WakiliApp may also use this information for customer support services (including to resolve disputes between users), for safety and security purposes, to improve our products and services and for analytics.

3. Information from other sources

These may include:

- User feedback, such as ratings or compliments.
- Users providing your information in connection with referral programs.
- Users requesting services for or on your behalf.
- Users or others providing information in connection with claims or disputes.
- WakiliApp business partners through which you create or access your WakiliApp account, such as payment providers, social media services, or apps or websites who use WakiliApp's APIs or whose API WakiliApp uses.
- Professional Insurance providers if you are an Advocate.
- Financial services providers such as Mobile Network Operators (MNOs).
- The owner of WakiliApp for Business or WakiliApp Family profile that you use.
- Publicly available sources.
- Marketing service providers.

WakiliApp may combine the information collected from these sources with other information in its possession.

How We Use Your Information

SUMMARY

WakiliApp collects and uses information to enable reliable and trustable phone and video call and other products and services. We also use the information we collect:

- To enhance the safety and security of our users and services
- For customer support
- For research and development
- To enable communications to or between users
- To provide promotions or contests
- In connection with legal proceedings

WakiliApp does not sell or share your personal information to third parties for thirdparty direct marketing purposes.

WakiliApp uses the information it collects for purposes including:

1. Providing services and features

WakiliApp uses the information we collect to provide, personalize, maintain and improve our products and services. This includes using the information to:

- Create and update your account.
- Verify your identity.
- Enable phone and video calls, and other services.
- Process or facilitate payments for those services.
- To track the progress of your phone and video call.
- Enable features that allow you to share information with other people, such as when you submit a compliment about an Advocate, refer a friend to WakiliApp.
- Perform internal operations necessary to provide our services, including troubleshooting software bugs and operational problems, to conduct data analysis, testing, and research, and to monitor and analyze usage and activity trends.

2. Safety and security

We use your data to help maintain the safety, security and integrity of our services and users. This includes, for example:

- Using device, location, profile, usage and other information to prevent, detect, and combat fraud or unsafe activities. This includes processing of such information, in certain regions, to identify practices or patterns that indicate fraud or risk of safety incidents. This may also include information from third parties. In certain cases such incidents may lead to deactivation by means of an automated decision making process.

- Using user ratings to encourage improvement by affected users, and as grounds for deactivating users with ratings below a certain minimum as may be required in their region.

3. Customer support

WakiliApp uses the information we collect (including recordings of customer support calls and texts after notice to you and with your consent) to assist you when you contact our customer support services, including to:

- Direct your questions to the appropriate customer support person
- Investigate and address your concerns
- Monitor and improve our customer support responses

4. Research and development

We may use the information we collect for testing, research, analysis and product development. This allows us to improve and enhance the safety and security of our services, develop new features and products.

5. Communications among users

WakiliApp uses the information we collect to enable communications between our users. For example, a user may text during the calls to an Advocate to provide additional information or questions.

6. Communications from WakiliApp

WakiliApp may use the information we collect to communicate with you about products, services, promotions, studies, surveys, news, updates and events.

WakiliApp may also use the information to promote and process contests and sweepstakes, fulfill any related awards, and serve you relevant ads and content about our services and those of our business partners. You may receive some of these communications based on your profile as WakiliApp user.

WakiliApp may also use the information to inform you about legal news, proposed bills, new regulations, administrative changes, and other political and policy processes that relate to our services.

7. Legal proceedings and requirements

We may use the information we collect to investigate or address claims or disputes relating to your use of WakiliApp's services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

Cookies and Third Party Technologies

SUMMARY

WakiliApp and its partners use cookies and other identification technologies on our apps, websites, emails, and online ads for purposes described in this policy.

Cookies are small text files that are stored on your browser or device by websites, apps, online media, and advertisements. **WakiliApp uses cookies and similar technologies for purposes such as:**

- Authenticating users
 - Remembering user preferences and settings
 - Determining the popularity of content
 - Delivering and measuring the effectiveness of advertising campaigns
 - Analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services
- We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our site and use our services, as well as when you visit other online sites and services. Please see our Cookie Statement for more information regarding the use of cookies and other technologies described in this section, including regarding your choices relating to such technologies.

Information Retention and Deletion

SUMMARY

WakiliApp retains user profile and other information for as long as you maintain your WakiliApp account.

WakiliApp retains transaction, location, usage and other information for 7 years in connection with regulatory, tax, insurance or other requirements in the places in which it operates. WakiliApp thereafter deletes or anonymizes such information in accordance with applicable laws.

Users may request deletion of their accounts at any time. Following such request, WakiliApp deletes the information that it is not required to retain, and restricts access to or use of any information it is required to retain.

WakiliApp requires user profile information in order to provide its services, and

retain such information for as long you maintain your WakiliApp account.

You may request deletion of your account at any time through the Privacy Settings in the WakiliApp, or via WakiliApp's website.

Following such request, WakiliApp deletes the information that it is not required to retain. In certain circumstances, WakiliApp may be unable to delete your account; such as if there is an outstanding credit on your account or an unresolved claim or dispute. Upon resolution of the issue preventing deletion, WakiliApp will delete your account as described above.

WakiliApp may also retain certain information if necessary for its legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, if WakiliApp shuts down a user's account because of unsafe behavior or security incidents, WakiliApp may retain certain information about that account to prevent that user from opening a new WakiliApp account in the future.

Choice and Transparency

SUMMARY

WakiliApp provides means for you to see and control the information that WakiliApp collects, including through:

- in-app privacy settings
- device permissions
- in-app ratings pages
- marketing opt-outs

You may also request that WakiliApp provide you with explanation, copies or correction of your data.

A. PRIVACY SETTINGS

The Privacy Settings menu in the App gives users the ability to set or update their location and contacts sharing preferences, and their preferences for receiving mobile notifications from WakiliApp. Information on these settings, how to set or change these settings, and the effect of turning off these settings are described below.

- **Location Information**
 - WakiliApp uses user's device location services to make it easier to find the closest, reliable Advocate whenever you need one. Location data helps improve our services, including phone and video calls, navigation, and customer support.
- **Share Live Location (Users)**
 - If you have enabled the device location services on your mobile

device, you may also enable WakiliApp to share your location with your Advocate from the time you request a phone or video call to the start of the conversation.

- **Notifications: Account and Updates**

- WakiliApp provides users with status notifications and updates related to your account. These notifications are a necessary part of using the WakiliApp and cannot be disabled. However, you may choose the method by which you receive these notifications through the Privacy Settings menu in the WakiliApp.

B. DEVICE PERMISSIONS

Most mobile platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without your consent. And these platforms have different permission systems for obtaining your consent. The iOS platform will alert you the first time the WakiliApp wants permission to access certain types of data and will let you consent (or not consent) to that request. Android devices will notify you of the permissions that the WakiliApp seeks before you first use the app, and your use of the app constitutes your consent.

C. RATINGS LOOK-UP

After every phone or video calls, users are able to rate the Advocates, as well as give feedback on how the call went. This helps App to provide services.

Your Advocate rating is available in the Ratings tab of the WakiliApp

D. EXPLANATIONS, COPIES AND CORRECTION

You may request that WakiliApp:

- Provide a detailed explanation regarding the information WakiliApp has collected about you and how it uses that information.
- Receive a copy of the information WakiliApp has collected about you.
- Request correction of any inaccurate information that WakiliApp has about you. You can make these requests by contacting WakiliApp here.

You can also edit the name, phone number and email address associated with your account through the Settings menu in WakiliApp.

E. MARKETING OPT-OUTS

You may opt out of receiving promotional emails from WakiliApp here. You may also opt out of receiving emails and other messages from WakiliApp by following the instructions in those messages. Please note that if you opt out, we may still send you non-promotional messages, such as information about your account.

Updates to this Policy

SUMMARY

We may occasionally update this policy.

We may occasionally update this policy. If we make significant changes, we will notify you of the changes through the WakiliApp or through other means, such as email. To the extent permitted under applicable law, by using our services after such notice, you consent to our updates to this policy.

We encourage you to periodically review this policy for the latest information on our privacy practices. We will also make prior versions of our privacy policies available for review.