

***This Privacy Policy was last reviewed and updated in 12 July 2023***

## **1. Introduction**

1.1 Reel Avenue PTY Ltd is a private company (registration number UIN BW00000249581) (Moeng/ We/ Our/Us”) which operates the Moeng website; [www.moeng.io](http://www.moeng.io) (“Website”).

1.2 Moeng respects, considers important and protects the privacy interests and personal information of visitors to and users of (“Users/ You/ Your /Yours”) Website (“Sites”) in terms of the Privacy Policy described below.

1.3 This Privacy Policy should be read carefully to understand how we will treat your Personal Information together with Our Terms, which can also be found on the Website.

1.4 This Privacy Policy has been developed to acknowledge the importance of and assist in providing a framework for, the appropriate level of protection for consumer identification, collection, holding, using, disseminating, merging, collating, disclosing and protection of Your personal information (“process” or “processing”) and represents Our commitment to compliance with EU data protection legislation, including the Protection of Personal Information (“POPI”), the Consumer Protection Act, the Electronic Transactions and Communications Act and all other applicable privacy legislation.

1.5 This Privacy Policy will be governed by and construed and interpreted in accordance with the laws of Botswana.

1.6 Words, phrases and expressions which are used in this Privacy Policy will have the meanings given to them in the Terms, unless it is stated otherwise.

## **2. Acceptance of Privacy Policy**

2.1 By submitting your details or visiting or using the Sites You accept this Privacy Policy and updates thereto and expressly consent to the use and disclosure of your Personal Information in the manner described herein. If You object to any of the potential uses described in this Privacy Policy please don’t use the Sites or register on the Website.

2.2 We review our policies regularly and occasionally may need to change or update them. The most current version of this Privacy Policy will always be posted under the Privacy Policy tab of the Sites and will be effective from the date of posting.

2.3 You agree that You will check the Privacy Policy from time to time. By continuing to access and/or use the Sites after We make changes to this Privacy Policy, You agree to be bound by the revised Privacy Policy. If You do not agree to the new terms of the Privacy Policy, You should stop using the Sites.

### **3. Personal Information**

Personal information is any information that identifies or relates specifically to You, including, for example, Your name, age and contact numbers. In short, any information that We know about You will be regarded as Your personal information.

### **4. Personal Information We collect**

4.1 The following Personal Information is collected by or on behalf of Moeng from You, the documentation We request and You provide or from information about You that is publicly available as well as from third parties from whom We are authorised to collect the personal information or which, by law We are entitled to collect.

4.1.1. Information that you provide to Moeng.

4.1.1.1. When You register and create or update Your Account on the Website, We require You to provide Us with personal information which includes but is not limited to Your name and surname, email address, mobile number, login name and password.

4.1.1.2. Information required and given when You Contact Us, including for customer support. We want to provide You with the best possible service, so calls to Moeng will be recorded and/or monitored for quality checks and staff training. Recordings may also be used to help Us combat fraud.

4.1.1.3. Information given when You complete surveys sent to You by or on behalf of Moeng.

4.1.2. Information created when You use Our Sites or services.

4.1.2.1. Location information - depending on the Moeng services that You use, and Your app settings or device permissions, Moeng may collect Your precise or approximate location information as determined through data such as GPS, IP address and WiFi.

4.1.2.2. Transaction information - We collect transaction details relating to Your use of Our Sites and Services (including the type of Services You requested, date and time of the Service, and amount of the Service).

4.1.2.3. Usage and preference information - We collect information about how You interact with Our Sites, preferences expressed, and settings chosen. In some cases, We do this through the use of cookies, pixel tags, and similar technologies that create and maintain unique identifiers.

4.1.2.4. Device information - We may collect information about the devices You use to access and use Our Sites.

4.1.2.5. Log information – information about Your interaction with and access to the Sites.

4.1.2.6. Information from referring websites/applications.

#### 4.1.3. Information from other sources

Information from Partner Retailers, Delivery Agents and payment processors, marketing service providers, third party business partners and relevant governmental departments.

#### 4.1.4. Additional Data Collection

4.1.4.1. We may collect information about Your device including, where available, Your IP address, operating system and browser type - for system administration and to report aggregate information to Our advertising partners which allow Us to have a better understanding of Our customer requirements and/or preferences by using cookies to track Users as they travel from website to website recording what commercial advertisements they view and select while browsing.

4.1.4.2. This is statistical data about browsing actions and patterns does not identify any individual. We may also obtain information about Your general internet usage by using a cookie file which is stored on the hard drive of Your computer. Cookies enable Us to improve Our service to You, estimate Our audience size and usage patterns, store information about Your preferences and recognise You when You return to Our Sites.

4.1.4.3. You can set Your web browser to refuse cookies, but if You do this You may not be able to enjoy full use of the Sites.

4.2 Moeng may combine information collected from these sources with other information in its possession.

4.3 Should Your personal information change, please inform Us and provide Us with updates to your personal information as soon as reasonably possible to enable Us to update Your personal information.

4.4 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.

## **5. What We Use Your Personal Information for (Purpose)**

5.1 You agree that We may process Your personal information for the following purposes:

5.1.1. to create and update Your account;

5.1.2. to verify Your identity;

5.1.3. to improve Our service offering and Your experience on the Sites by, for example, monitoring Your browsing habits, or tracking Your events on the Sites;

5.1.4. to tailor Your experience on the Sites and Services to ensure content is customised and displayed according to Your preferences;

5.1.5. to perform internal operations necessary to provide Our Services, including troubleshoot software bugs and operational problems, to conduct data analysis, testing, and research, and to monitor and analyze usage and activity trends;

5.1.6. for customer support;

5.1.7. for testing, research, analysis and product development. This allows Us to improve and enhance the safety and security of Our Sites and Services, develop new features and products in connection with Our Sites and services.

5.1.8. to investigate or address claims or disputes relating to Your use of Our Sites and Services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and regulatory;

6. Who We share Your personal Information with

6.1 You agree that We may disclose Your personal information to the following persons:

6.1.2. to law enforcement, government officials, fraud detection agencies or other third parties when We believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report or support the investigation into suspected illegal activity, or to investigate violations of the Terms;

6.1.3. to Our service providers (under contract with Us) who help with parts of Our business operations (fraud prevention, technology services etc.). Our contracts dictate that these service providers may only use Your Personal Information in connection with the services they perform for Us and not for their own benefit;

6.1.4. to third party service providers for services such as, website hosting, data analysis, infrastructure provision, IT services, customer service, e-mail delivery services, and other similar services, to enable them to provide services;

6.1.5. to third parties' sponsors of promotions (irrespective of whether such promotions are hosted by Us), or otherwise in accordance with the rules applicable to such promotions. You should carefully review the rules, if any, of each promotion in which You choose to participate, as they may contain additional important information about Our, a sponsor's and/or other third parties' use of Your personal information;

6.1.6. to an affiliate or other third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Our business, assets or stock (including without limitation in connection with any insolvency and/or similar proceedings).

6.1.7. any person other than as described herein if We notify You and You consent to the sharing.

6.2 We will ensure that all of Our employees, third party service providers, divisions, affiliates and third party business partners (including their employees and third party service providers) having access to Your personal information are bound by appropriate and legally binding obligations in relation to the confidentiality and security of Your Personal Information and are restricted in their processing thereof as per this privacy policy.

## **7. How We hold personal information securely**

7.1 We will treat Your personal information as strictly confidential, save where We are entitled to share it as set out in this privacy policy.

7.2 In all circumstances the information is held by Us on Our secure systems. We take all reasonable and appropriate technical and organizational steps to ensure that Your personal information is kept secure and is protected against unauthorized or unlawful processing, misuse, unauthorized disclosure, loss, interference, destruction or damage, alteration, disclosure or access.

7.3 Our security systems are in line with industry standards and We monitor developments to ensure that Our security systems evolve, as required. We also test our systems regularly.

7.4 Personal information is destroyed or anonymized when no longer needed or when We are no longer required by law to retain it (whichever is the later).

7.5 We will promptly notify You if We become aware of any unauthorized use, disclosure or processing of Your personal information.

7.6 We may store Your personal information with the web-hosting service provider appointed by Us from time to time. The storage may be in Botswana or in another country.

7.7 Where storage is in another country, Your personal information will be stored in a jurisdiction that has equivalent, or better, data protection legislation than Botswana or with a service provider which is subject to an agreement requiring it to observe data protection requirements equivalent to or better than those applicable in Botswana.

7.8 Notwithstanding the above, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. Please do not send Us sensitive information through email. If You have reason to believe that Your interaction with Us is not secure (for example, if You feel that the security of any account You might have with Us has been compromised), You must immediately notify Us of the problem by contacting us at [hello@Moeng.co.bw](mailto:hello@Moeng.co.bw)

## **8. Access to your personal information**

8.1 You may at any time request:

8.1.1. confirmation that We hold Your personal information;

8.1.2. access to Your personal information to view and/or update personal details;

8.1.3. the identities or categories of third parties to whom we have disclosed your personal information; or

8.1.4. that we correct or delete any personal information that is incomplete, misleading, inaccurate, excessive or out of date

8.2 Requests may be made in writing to [hello@Moeng.co.bw](mailto:hello@Moeng.co.bw)

## **9. Disclaimer and Indemnity**

9.1 Whilst We will do all things reasonably necessary to protect Your rights of privacy, We cannot guarantee or accept any liability whatsoever for unauthorized or unlawful disclosures of Your personal information, whilst in Our possession, made by third parties who are not subject to Our control, unless such disclosure is as a result of Our gross negligence or non-compliance with applicable laws.

9.2 If You disclose your personal information to a third party, such as an entity which operates a website or mobile application linked to the Sites or anyone other than Moeng, Moeng SHALL 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 information. You should always ensure that You read the privacy policy of any third party.

## **10. Contacting Us**

If you have any questions regarding this Privacy Policy, please contact us by e-mail at [hello@Moeng.co.bw](mailto:hello@Moeng.co.bw)