

Luckee Privacy Policy & Data Protection

This Privacy Policy outlines how Luckee and its parent, subsidiaries, or affiliates (collectively, “Luckee,” “we,” “our,” or “us”) process the information we collect about you through our websites, mobile apps, and other online services (collectively, the “Services”) and when you otherwise interact with us, such as through our customer service channels.

1 TYPES OF INFORMATION COLLECTED AND HOW WE COLLECT THEM

Personal Information You Provide:

We collect the following personal information you provide when you use our Services, like when you sign up for a Luckee account (“Membership”), or have taken steps to register for Membership, request a transaction, enroll in a promotion or program, or otherwise engage or communicate with us:

1. **Identity Data** includes your full name, date of birth, and gender.
2. **Contact Data** includes your email address, residential address, and telephone numbers.
3. **Financial Data** includes your bank account number and your financial transaction history while on this platform.
4. **Profile Data** includes your username, nickname and password, feedback.
5. **Usage Information** includes information about how you access and use our Services, such as your actions on the Services, including your interactions with others on the Services, your username, your nickname, and other content you provide (“Usage Information”). If you need to update your permissions, you can do so in your device’s settings. Please remember that Luckee may, but has no obligation to, monitor, record, and store Usage Information in order to protect your safety or the safety of other users, to assist with regulatory or law enforcement efforts, to protect and defend our rights and property, or for other reasons relating to our provision of the Services. By using the Services, you consent to the recording, storage, and disclosure of such information you send or receive for these purposes.
6. **Additional Information** includes information that you submit via suggestions, job applications, customer support, or other similar means. We may also collect any

communications between Luckee and you (including recording calls made to or by Luckee) and any other information you provide to Luckee.

Personal Information Collected Automatically:

As is true of many digital platforms, we collect certain personal information automatically when you visit our online services, including:

- **Usage and Device Data Collected Automatically.**
To provide a personalized and enhanced user experience, we, and our third-party partners, automatically collect certain types of usage information when you visit or use our Services, or otherwise engage with us

Personal Information from Other Sources and Third Parties:

We also obtain personal information from other sources, which we often combine with personal information we collect either automatically or directly from you.

- **Third-party Data** includes data that we collect from business partners, marketing, payments gateways, and vendor partners.
- **Third Party Services.** If you link, connect, or log in to your Luckee Account with a third-party service (e.g. Google, Apple), the third-party service may send us information such as your profile information from that service. This information varies and is controlled by that service or as authorized by you via your privacy settings at that service.
- **Publicly Available Data** includes your contact information and other information from publicly available sources. We may combine this information with the information we collect from you directly. We use this information to contact you, to send you advertising or promotional materials, to personalize our Services, and to better understand the demographics of our users.

2 HOW WE USE YOUR INFORMATION

We use and process the information we collect for purposes described in this Privacy Policy or as otherwise described to you on our Services or in connection with our Services. For example, we use your information to:

- **Create and process your account and deliver the Services to you,** including to allow you to register for the Services and participate in gaming activities and for Luckee to authenticate your identity, handle billing and account management, fulfill our legal and regulatory obligations such as obligations that apply to being a licensed Nigerian Mobile Gaming platform, event market, and complete other administrative matters;

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- **Send you transactional information**, including confirmations, invoices, technical notices, product and services information and announcements, software updates, security alerts, support and administrative messages, and information about your transactions with us;
 - **Communicate with you** such as to respond to your comments and questions, deliver newsletters or other content we believe you will be interested in, provide customer service or feedback, contact you about amounts owed, conduct surveys, respond to employment opportunities for which you've applied, notify you about upcoming events, or for any other purposes in connection with the Services;
 - **Conduct research and analytics** to understand our visitors and customers and tailor our product offerings;
 - **Provide you with updates about products and services** offered by us and selected partners, as well as facilitate new promotions, and rewards;
 - **Make suggestions and recommendations to you** about things that are similar to those about which you have inquired or that may otherwise be of interest to you, such as providing you with advertisements based on your interests and activity on the Services;
 - **Monitor, administer, and enhance our Services, including troubleshooting, data analysis, testing, research, statistical, and survey purposes;**
 - **Enhance the safety and security of our Services, Platform, and Members**, and investigate or provide notice of fraud or unlawful or criminal activity;
 - **Perform audits and protect or exercise our legal rights or defend against legal claims**, including to enforce and carry out contracts and agreements; and
 - **Comply with applicable laws and legal obligations.**

3 DISCLOSURES OF PERSONAL INFORMATION

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the personal information we collect. We may share your personal information in the instances described below. For further information on your choices regarding your personal information. We do not sell or rent your personal information to third parties, aside from substantial corporate transactions (described below).

- Authorized third-party vendors and service providers. We share personal data with certain authorized and vetted contractors, subcontractors, third-party vendors, and service providers who help us run and protect our business. This includes sending emails, conducting business analytics, marketing, and data processing. For example, we may share personal data with service providers that identify and serve targeted advertisements or provide mailing services, tax and accounting services, contest fulfillment, web hosting, or analytics services.

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- *Substantial corporate transactions.* We may share personal data in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, reorganization, financing, change or control or acquisition of all or a portion of our business by another company or third party, asset sale, initial public offering, or in the unlikely event of bankruptcy or similar proceeding.
 - *Legal purposes.* We disclose personal data to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims, or government inquiries and to protect and defend the rights, interests, safety, and security of Luckee, our affiliates, users, or the public.
 - *With your consent.* We share personal data for any other purposes disclosed to you with your consent. We may also share information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

4 THIRD-PARTY LINKS

Some of the Services may contain links to content maintained by third parties that we don't control. We're not responsible for the privacy practices of these third parties or the content on the third-party services, and the information practices of these third parties are not covered by this Privacy Policy. Please note that these third-party services have their own privacy policies, and we strongly recommend that you read their privacy policies as well as terms and conditions of use to understand how they collect, use, and share your information.

5 THIRD-PARTY TRACKING AND ONLINE ADVERTISING

We participate in interest-based advertising and use third-party advertising companies to serve you targeted advertisements based on your online browsing history and your interests. We permit third-party online advertising networks, social media companies, and other third-party services to collect information about your use of our Services over time so that they may play or display ads on other websites, apps, or services you may use, and on other devices you may use. Typically, though not always, the information used for interest-based advertising is collected through cookies or similar tracking technologies. For advertising, we may share a common account identifier (such as an email address or user ID) or hashed data with our third-party advertising partners to help identify you across devices. We and our third-party partners use this information to make the advertisements you see online on other platforms more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics, and market research.

We're not responsible for the privacy practices of these third parties, and the information practices of these third parties are not covered by this Privacy Policy. Some of these companies are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies. To learn more, please visit <http://www.networkadvertising.org/choices> or the DAA's resources, available at <http://www.aboutads.info/choices>. You may also be able to set your browser to delete or notify you of cookies by actively managing the settings on your browser or mobile device. Please note that some advertising opt-outs may not be effective unless your browser is set to accept cookies. Furthermore, if you use a different device, change browsers, or delete the opt-out cookies, you may need to perform the opt-out

task again. You may also be able to limit certain interest-based mobile advertising through the settings on your mobile device by selecting “limit ad tracking” (iOS) or “opt out of interest based ads” (Android).

Google Analytics and Advertising. We use Google Analytics to recognize you and link your devices and when you use our Services on your browser or mobile device, log in to your account on our Services, or otherwise engage with us. We share a unique identifier, like a user ID or hashed email address, with Google to facilitate the Services. Google Analytics allows us to better understand how our users interact with our Services and to tailor our advertisements and content to you. For information on how Google Analytics collects and processes data, as well as how you can control information sent to Google, see “How Google uses data when you use our partners’ sites or apps” linked here:

<http://www.google.com/policies/privacy/partners/>. You can learn about Google Analytics’ currently available opt-outs, including the Google Analytics Browser Ad-On, here:

<https://tools.google.com/dlpage/gaoptout/>. We may also use certain forms of display advertising and other advanced features through Google Analytics, such as Remarketing with Google Analytics, Google Display Network Impression Reporting, the DoubleClick Campaign Manager Integration, and Google Analytics Demographics and Interest Reporting. These features let us to use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick advertising cookie) or other third-party cookies together to inform, optimize, and display ads based on your use of our Services. You may control your advertising preferences or opt-out of certain Google advertising products by visiting the Google Ads Preferences Manager, currently available at <https://google.com/ads/preferences>, or by visiting NAI’s online resources at <http://www.networkadvertising.org/choices>.

6 CONTROL OVER YOUR INFORMATION

Account profile. You may update certain of your account profile information by logging into your account.

Access to your device data. You may control the mobile app’s access to your device information in your device’s settings.

How to control your communications preferences. You can stop receiving promotional emails from us by clicking on the provided “unsubscribe” link. You may not opt out of service-related or other nonpromotional communications (e.g., account verification, transactional communications, changes/updates to features of the Services, and technical and security notices).

7 TRANSFER OF PERSONAL INFORMATION

Our Services are currently designed for use only in certain select markets. If you are using our Services from another jurisdiction, your information collected through our Services may be stored and processed in the Nigeria or any other country in which Luckee or its parent, subsidiaries, affiliates, or service providers maintain facilities or conduct business activities. If you are located in other regions with laws governing data collection and use that may differ from Nigerian law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data-protection laws as your jurisdiction.

8 CHILDREN'S PRIVACY

We do not knowingly collect or solicit any information from anyone under the age of 15 on these Services. In the event that we learn that we have inadvertently collected personal information from a child under age 13, we will take reasonable steps to delete that information. If you believe that we might have any information from a child under 15, please contact us at legal@Luckee.ng.

9 CHANGES TO THIS POLICY

This Privacy Policy will evolve with time, and when we update it, we will revise the "Effective Date" herein and post the new Privacy Policy. To stay informed of our privacy practices, we recommend you review the Privacy Policy on a regular basis as you continue to use our Services.

10 HOW TO CONTACT US

If you have any questions about this Privacy Policy or the Services, please contact us at legal@Luckee.ng.