## **Privacy Policy**

## Last updated: 22/09/2025

This Privacy Policy explains how Goheza ("Goheza", "we", "us", or "our") collects, uses, discloses, and safeguards personal information when you access or use our website, platform, and related services, including when you connect yourTiktok, Facebook, or Instagram accounts to Goheza. It also outlines your rights and how you can exercise them. By using our Service, you consent to the collection and use of your information as described in this Privacy Policy.

### Who We Are

**Company:** Goheza Technologies Company Limited **Address:** Plot 19-21 Port Bell Road, Nakawa, Kampala

Email: info@goheza.com
Website: goheza.com

Depending on the context, we may act as a data controller or as a data processor on behalf of our business clients. When we act as a processor, the brand is considered the data controller, and our Data Processing Agreement applies.

# **Scope of This Policy**

This policy applies to:

- Our public website (<u>goheza.com</u>)
- The Goheza web application and APIs
- Any integrations you connect to Goheza, including Tiktok, Facebook and Instagram
- Support, sales, and onboarding communications

### **Definitions**

- Account: A unique account created to access the Service or certain parts of the Service.
- **Affiliate:** Any entity that controls, is controlled by, or is under common control with Goheza.
- Company: Refers to Goheza (also "the Company", "we", "us", or "our").
- Cookies: Small files stored on your device by a website.
- Country: Uganda.
- Device: Any device capable of accessing the Service, including computers, phones, or tablets.
- Personal Data: Information relating to an identified or identifiable individual.
- **Service:** Refers to our website, platform, dashboards, APIs, and any related features.
- Service Provider: Any natural or legal person processing data on behalf of Goheza.
- **Usage Data**: Data automatically collected from your use of the Service or from its infrastructure (e.g., time spent on pages).
- Website: Goheza, accessible at goheza.com.
- **You:** The individual accessing or using the Service, or the entity on whose behalf the individual is accessing or using the Service.

## **Data We Collect**

### 4.1 Data You Provide to Us

- Account Data: Name, email address, password, company, role.
- **Billing Data:** Company name, VAT/CVR number, address, invoicing contacts, payment method (processed by our payment provider; we do not store full card numbers).
- **Communications:** Support messages, emails, calls, feedback, surveys.

- **Campaign Data:** Creative briefs, product or service information, creator lists, pricing, deliverables.
- Contracts and Legal Agreements: Signatures, acceptance of terms, dates.

## 4.2 Data Collected Automatically (Usage Data)

- IP address, browser type and version, device identifiers, operating system, referring URLs, pages visited, time and date of visit, time spent on pages, clickstream data, error logs.
- Mobile device users: device type, OS, unique device ID, mobile browser type, approximate location (based on IP).

## **Cookies and Similar Technologies**

We use cookies, web beacons, pixels, and similar technologies to deliver, secure, analyze, and improve our Service. Cookies may be **session cookies** (deleted when the browser is closed) or **persistent cookies** (stored until they expire or are deleted).

## Tiktok, Facebook and Instagram Data (Meta APIs)

When you connect your Tiktok, Facebook or Instagram account or ad account to Goheza, we may access certain data through APIs. The requested permissions and their uses are as follows:

### a) instagram\_branded\_content\_ads\_brand

- Data Accessed: IDs of eligible creator posts, post metadata for running branded content/Creator Ads (e.g., media ID, caption, status), ability to authorize or stop branded content ads on your behalf.
- **Purpose:** To allow brands to boost creator posts (Creator Ads/Branded Content Ads) directly from Goheza, and to retrieve delivery status and high-level performance data.
- **Usage:** We display eligible creator posts, create ads, and show performance metrics in our reporting interface.

### b) ads\_read

• **Data Accessed:** Read-only ad account insights and metrics including spend, impressions, reach, clicks, CTR, CPC, CPM, video views, and other standard Ads

Insights fields.

- Purpose: To enable performance reporting for Creator Ads and campaigns tracked within Goheza.
- **Usage:** We only read reporting data; we do not modify ads or ad accounts. We do not sell this data or use it to create independent profiles outside of the requested services.

**Revoking Access:** You can remove Goheza's access anytime via Facebook Settings  $\rightarrow$  Business Integrations or Instagram Settings  $\rightarrow$  Security  $\rightarrow$  Apps and Websites. Read further for details on what happens when access is revoked or data deletion is requested.

### **Sources of Personal Data**

- Directly from you (account creation, emails, contracts, forms)
- Automatically from your use of the Service (Usage Data, cookies)
- From connected Tiktok, Facebook/Instagram accounts and ad accounts (via the permissions above)
- From publicly available sources (e.g., social media handles) where permitted by law
- From service providers and partners supporting onboarding, analytics, payments, hosting, and support

# **Purposes and Legal Bases for Processing**

#### **Contract Performance**

- To create and manage accounts
- To deliver platform functionality, including Creator Ads/Branded Content Ads and reporting
- To provide support, onboarding, and implementation
- To manage billing and subscriptions

## **Legitimate Interests**

• To secure and protect the Service (fraud prevention, abuse detection, incident response)

- To improve and develop the Service (analytics, product research)
- To enforce terms and defend legal claims
- To contact users with relevant platform updates

#### Consent

- For specific marketing communications
- When you choose to connect external accounts and grant permissions (consent can be withdrawn anytime)

## **Legal Obligations**

- To comply with tax, accounting, and statutory requirements
- To respond to lawful requests from public authorities

## **Sharing of Personal Data**

We may share personal data with:

- Service Providers/Sub-processors: Cloud hosting, analytics, logging, email, payment processors, support tools; all bound by confidentiality and data processing agreements
- Business Partners (on your instruction): Brands, agencies, or creators collaborating on the platform
- Affiliates: Entities under common control with Goheza, subject to this policy
- **Professional Advisors:** Lawyers, auditors, insurers, where necessary
- Authorities: When required by law or to protect rights, safety, or property
- **Business Transactions:** Merger, acquisition, financing, or sale of assets; users will be notified if data becomes subject to a different privacy policy

We do not sell personal data.

### **International Data Transfers**

Your data may be processed outside Uganda. Where this occurs, we rely on lawful transfer mechanisms such as the European Commission's Standard Contractual Clauses (SCCs) or other appropriate safeguards. You may contact us for details on the safeguards in place.

#### Retention

We retain personal data only as long as necessary for the purposes described or as legally required. Typical retention periods:

- Account and Profile Data: Lifetime of your account, plus up to 30 days after deletion/disconnection (unless legally required longer)
- **Meta-sourced Data:** Lifetime of account or until access is revoked, then deleted within 30 days (unless law requires longer)
- Billing and Transaction Records: Minimum 5 years (or as required by law)
- **Support Communications:** Up to 3 years after resolution
- Logs and Security Data: Typically 12 months
- Aggregated/Anonymized Analytics: Indefinitely, cannot be linked to individuals

## **Your Rights**

Subject to applicable law, you may have the following rights:

- Access your personal data and receive a copy
- Correct inaccurate or incomplete data
- Delete your data (right to erasure)
- Restrict processing
- Object to processing based on legitimate interests or direct marketing
- Data portability
- Withdraw consent where processing is based on consent

Lodge a complaint with your local supervisory authority

To exercise these rights, email **info@goheza.com**. Identity verification may be required.

## **Revoking Meta Access and Data Deletion**

You may revoke access anytime:

• Facebook: Settings & Privacy → Settings → Business Integrations

• **Instagram:** Settings → Security → Apps and Websites

You may also request data deletion via **info@goheza.com**. Meta-sourced personal data will be deleted within 30 days unless law requires longer retention. Brand account users should also contact their brand admin, who may control the data.

# **Security**

We implement technical and organizational measures to protect personal data, including encryption in transit and at rest (where applicable), access controls, least-privilege principles, logging and monitoring, backups, and vendor due diligence. No method of transmission or storage is 100% secure, and absolute security cannot be guaranteed.

# Children's Privacy

Our Service is not intended for children under 18, and we do not knowingly collect data from children under 18. Parents or guardians who believe their child has provided personal data should contact us for deletion. If parental consent is required by law, we will obtain it.

# **Automated Decision-Making**

We do not use automated decision-making that produces legal or similarly significant effects. Changes to this practice will be reflected in this policy.

# **Cookies and Similar Technologies**

We use session and persistent cookies for:

- Necessary/Essential: Authentication, security, fraud prevention
- Functionality: Remembering preferences, language, login status
- Analytics/Product Improvement

Cookies can be managed via your browser settings. Disabling cookies may affect Service functionality. See our Cookies Policy for details.

## **Third-Party Links**

Our Service may link to third-party websites or services. We are not responsible for their content or privacy practices. Please review their privacy policies.

# **Changes to this Privacy Policy**

We may update this Privacy Policy periodically. Changes will be posted on this page with the updated "Last updated" date. Where appropriate, users will be notified by email or via the Service. Review this policy regularly.

### **Contact Us**

**Company:** Goheza Technologies Company Limited **Address:** Plot 19-21 Port Bell Road, Nakawa, Kampala

Email: info@goheza.com

Data Deletion Requests: info@goheza.com

### **Complaints:**

If you believe we have mishandled your personal data, you may lodge a complaint with your local supervisory authority. Or email us at info@goheza.com

# **Sub-processors**

We use vetted sub-processors to deliver the Service (e.g., cloud hosting, analytics, email, payments, logging).