

THE BUKU APP

PRIVACY POLICY

Effective from 21 July 2025

We are The Buku App

This is our Privacy Policy. Please read it to find out more about who we are and what we do with your data. Let us know if you need help in understanding what it means for you.

We are The Buku App, The Buku App LLC, formerly known as Ecobuku LLC, and we operate the The Buku App and The Buku App website. Our address is not publicly disclosed at the moment, please email us for our legal address at contact@thebukuapp.com

We want to explain here how we use personal information about you (your data).

The Buku App can be accessed via our app or on our website (the Service). When you use our Service, we will collect and use data about you. We have written this Privacy Policy to explain what data we collect, how we use it and what choices you have in relation to your data.

WHAT DATA WE COLLECT AND HOW WE USE IT

We collect your data when you register to The Buku App and when you are using our Service. We use your data so that you can use the Service and, from time to time, we may use your data to comply with our legal obligations or for other legitimate reasons. There may also be times when we ask for your consent to use your data. We collect data from you when you use our Service or when you provide it to us, for example when you:

- Register to use the Service.
- List an item or service for sale or sell an item or service.
- Make an offer or buy an item.
- View, like, save, search for or comment on an item, add an item to your bag or communicate with other users.
- Sign up to our marketing emails and push notifications.
- Complete a form or survey.
- Participate in a research interview or focus group.
- Enter a competition or take part in a promotion.

We need a legal reason to collect and use your data. The main reason we use your data is to perform our contract with you, so that you can use our Service.

We may also collect and use your data if we:

- Are legally required.

- Have your consent.
- Have a legitimate reason to do so in a way which might reasonably be expected as part of running our business (known as a legitimate interest), as long as your interests and fundamental rights do not take priority over our legitimate reasons.

We have listed below more information on the types of data we collect and why we use it.

Contact Details and Proof of Identity

When you open your account you will provide us with contact information like your name, .edu email address, university affiliation, and phone number

We use this contact information so we can get in touch with you:

- About the products you buy and sell through the Service.
- About queries, issues or concerns you or other users have.
- If you enter a competition or take part in a promotion.
- To ask you to complete a form or survey.
- To ask you to participate in a research interview or focus group.
- To send you marketing communications.

If you deal with a The Buku App buyer or seller, we will share your contact details with them. This is a necessary part of buying and selling and using our Service.

Where we cannot confirm your identity using other information that we hold about you or that you have provided to us, we may need you to send us copies of identification documents, which we will use together with your contact information.

We use this data for our legitimate interest of verifying your details and helping prevent fraudulent access to the Service or use of your account.

Comments and Opinions

If you contact us, for example by email, phone, post or complete an online form, we will collect the comments and opinions you communicate to us.

We also collect data you provide to us, which includes comments and opinions, when you:

- Complete a form or survey.
- Participate in a research interview or focus group.
- Enter a competition or take part in a promotion.
- Post on community boards or other message areas.

We use comments and opinions where we have a legitimate interest to address any issues, concerns or questions, as well as to make our Service better for you and other users.

If you complete forms or surveys, participate in research interviews or focus groups, enter competitions or promotions, or post on community boards or other message areas, we use your data, including any comments and opinions, to help determine which products or services you might be interested in and to help send you marketing

messages about them. You can inquire further by contacting our team directly at contact@thebukuapp.com

Your Content and Images

We collect your content, which may feature images containing your personal data, when you voluntarily submit it to us when using the Service. We may use your content and/or images in our online and offline marketing campaigns, in this case we will ask your permission via email directly.

We process your personal data for these purposes either on the basis of our legitimate interests in order to promote Depop in our publicity and marketing campaigns or with your consent.

In-App Messages, Comments and Item Descriptions

If you send in-app messages or comments, or provide item descriptions, we may access, store and review these:

- To help with fulfilling a transaction made via our Service.
- To respond to issues, concerns, queries or disputes raised by users and to resolve disputes.
- If we believe the messages are in breach of our **Terms of Service**, or show that you have breached our **Terms of Service**, for example for the purposes of fraud prevention and/or safety of our users.

Payment and Transactions

We collect data, including payment information, in relation to items you buy or sell and the payment method(s) you use so you can pay for items and receive money for items that you have sold.

If you buy something using our Service, your username, name, that you provide during checkout will be shared with the seller for the purposes of your transaction. However, you should not share your details directly with sellers and if something does not feel right or you have any concerns, you can contact us at help@thebukuapp.com

If you sell an item using our Service and purchase the shipping label through The Buku App, we may share your name, address, email address and phone number with our shipping partner for inclusion on the shipping label to provide the Service to you. If you use one of our payment partners, including Buku Payments via Stripe, you authorise The Buku App to pass any information and payment instructions you provide (which may include name, email address, unique customer identifier, order ID, bank account details, payment card details, card expiration date, CVC code, date/time/amount of transaction, merchant name/ID and location) to the extent required to complete payments via the Service. Our support and moderation team will also have access to this information in order to process and support transactions and moderate refunds.

Our payment partners may also collect your information, including information collected by cookies or other similar means, to the extent this is necessary to process the transactions or to satisfy security requirements.

We also use your transaction information and your purchase history to help decide which products and services you might be interested in hearing about and to send you marketing messages about them. You can inquire about messages by reaching out to us at contact@thebukuapp.com

Website and app login

When you create an account and log in, we collect your username, password and information about your device. It is in our legitimate interest to use this data to keep your account secure.

You should keep your username and password safe and not share them with anyone else. You are responsible for actions that are taken using your username and password. If you think someone has access to your password or account, you should tell us immediately and change your password.

You can add an extra level of security to your account by turning on two-factor authentication.

Your Device

We will collect information about the device you are using to use the Service. This includes a computer, smartphone or any other electronic device that you can access the Service from.

This can include the type of device, unique device identifying number (such as Android ID, Apple ID or browser fingerprint), what operating system is used on the device, what browsers and applications are used to connect to our Service by your device, your internet service provider or mobile network, your IP address and your device telephone number (if it has one).

If you are logged into a registered account, this information may be associated with you.

We use this device information so that the way the Service is presented and works is suitable for your device. We also use this device information for our legitimate interest of ensuring any users that have been banned are not able to access the Service by creating a new account, as well as detecting and analysing potentially suspicious user activity in order to protect our Service and other users of our Service.

Your preferences

We use the preference and notification settings you have chosen to:

- Provide you with notifications.
- Send you marketing communications.
- Change how our app and/or website is displayed to you.
- Change what content you see through our Service.

HOW YOU CONNECT TO AND USE OUR SERVICE

We collect data about how you use our Service. This includes:

- Profiles you have viewed.
- Items you have listed, viewed, added to bag, bought, sold, searched for, saved, shared, liked or commented on.
- The time you access our Service and for how long.
- The website you came to our website from, or went after leaving our website.
- Any choices you make when using our Service.

We use this data (with the help of third party analytics providers) to:

- Understand how our Service is used, which we use for the legitimate interests of improving our Service.
- Show you your feed and search results on our Service and order the results in a way that is relevant to you. We use technology (an algorithm) that uses your preferences and, where you have consented to us using your location data, your location to do this.
- Display your items to the most relevant potential buyers. We use technology (an algorithm) to do this.
- Display the aggregate number of users interested in an item (e.g. by displaying the number of views, offers or the number of users who have added the item to their bag).
- Send you tips and other notifications we think will improve your experience of the Service.
- Assess if our marketing campaigns or promotions have been successful.
- Send you marketing (including via email) about products and services we think may be of interest to you.
- Detect or prevent any breach of our **Terms of Service**.

Location

If you have given us your consent, for example via your device settings where permissible, we collect and use your location information to provide you with features of the Service that are relevant to you and your location. Aggregated postcode information is also occasionally used to measure the performance of marketing campaigns we conduct. We may use other information we have together with your location to do this. For example, this helps you to search for items that are for sale in your local area.

If you change your mind about allowing us to use your location information, you can update your preferences in your device settings at any time.

University Affiliation

If you establish enrollment at a University and must update this information for any reason, please communicate your reason for update and the enrollment confirmation of your new University (Ex. Transfer from USC to NYU). Please communicate this change so we can update your account by emailing contact@thebukuapp.com

Other Users

Sometimes other users of our Service may provide data about you, such as comments, feedback, and likes relating to your items, and messages they send to you.

Other users can also share information about an item they have bought from you on other social networks that link to The Buku App. However, this is only information that is already public.

If users want to invite you to use our Service or share information about our Service, we will use data they provide to us about you to help them to do this. We will only do this if they have told us that you have agreed they can communicate with you in this way.

Fraudulent or Criminal Activity, or activity that violates our Terms

We use data about fraudulent or criminal activity which is related to your use of our Service. We use this for our legitimate interests in detecting and preventing fraud and crime, and to comply with our legal obligations. So that we can provide the Service to you on the basis of our **Terms of Service** we may monitor the data you provide when using the Service to detect and respond to potential fraud, abuse or breaches of our Terms of Service, including listings (description, price), messages, user profile information, phone number, location, linked account information and/or device ID. This can lead to various enforcement actions, from issuing an account warning and content removal to permanently banning an account from the platform. In some cases to protect our Service, this detection and enforcement takes place automatically using machine learning tools (such as in the case of detecting fraud, phishing, commercial spam or users that may have previously been removed from our Service).

Other uses of your data

We will use data we collect to:

- Monitor and improve our Service.
- Help us develop new products and services.

When we use your data for these purposes, this won't result in any data that wasn't previously publicly available being made public on our Service.

We also use your data to resolve disputes between users, provide support to users, and to troubleshoot and help solve problems.

Sensitive Data

We may collect sensitive data, such as information about your religious beliefs, racial or ethnic origin, physical and mental health details, or sexual orientation.

We collect and use such data when we have your express consent, for example when you complete a survey. With your permission, we may feature you or your profile in

publicity and marketing campaigns. Providing your sensitive data for these purposes is entirely voluntary.

We may also collect and use such data to comply with government regulations and guidance.

If you put your own sensitive data on the Service (including where you self-declare certain types of sensitive data on the Service), you acknowledge you are deliberately making this data public at your own choice and that we may use such data for the purposes mentioned above. We may remove such data, or request that you remove such data, from our Service at any time.

YOUR MARKETING PREFERENCES

We may send you emails about products and services we think you will like, but you can always tell us if you don't want to receive these anymore.

If you give us your permission, we will send you push notifications

- Email: We may contact you by email about our products and services. If you don't want us to contact you by email with marketing messages, you can unsubscribe from our marketing emails by clicking on the unsubscribe link in the emails we send to you.
- Push notifications: If you give us permission in your device settings to send push notifications, we will send you these notifications from our Service. You can change your push notification settings at any time in your device settings or via the The Buku App.

WHAT DATA CAN OTHER USERS SEE THROUGH OUR SERVICE

When you use our Service, some of your data is public and can be seen by others. This includes your profile information, such as your username, profile picture, and University Affiliation. Information about items and services you list to sell are public, and some things you do on our Service such as buy or sell an item are also public. This information is public to allow buyers and sellers to use our Service, including to allow buyers and sellers to make informed decisions regarding purchases and sales.

Our Service helps users interact with each other. To make this happen, some data generated through the Service is shared with other users of the Service.

- User profile: When you create an account, the Service creates a user profile for you. The data in your user profile is publicly available. This includes your username, city and country location, your followers and who you are following, and details about the items you are selling.

You can also choose to add information to your profile, such as a profile picture, profile description or bio, and University Affiliation. If you add these to your profile, they will also be publicly available.

In general, we don't give user email addresses to other users.

- Item/Service listings: If you list an item or service for sale on The Buku App, any information you add to the listing will be publicly available. This includes item photographs, videos, price and description.

Other users can share a link to an item they have bought from you on the Service on other social networks that are linked to the Service.

WITH WHOM DO WE SHARE YOUR DATA

We may need to share your data, for example with other companies that are in our group of companies, to third parties that provide us with services or for legal reasons.

We may share your data with:

- Companies in our group: This includes our subsidiaries (any company we own or control), or ultimate holding company (any company that owns or controls us) and any subsidiaries it owns. Companies within our group will only use your data to provide you with the Service and for any other purpose we have described in this Privacy Policy. Campus Moderators hired through The Buku App LLC monitor our Service, to ensure our Terms of Service are not being breached and that no criminal activity is taking place using our Service.
- Our service providers: These are third parties that provide services to us. These third parties are only allowed to use your data in accordance with our instructions to them. We may need to share your data with service providers such as:
 - Payment providers, to process sales transactions.
 - Identification verification service providers, to verify your access to the Service and prevent fraudulent activity on your account.

In some cases, our service providers may collect data directly from you, for example if they are asked to conduct a survey for us. Where this happens, you will be notified of their involvement and any data you provide to them will be completely optional. The service provider's use of your data is governed by its privacy policy.

- Advertising partners: We may share data about users of the Service with our advertising partners to help us better target our ads and understand the effectiveness of our ads, as described in Section 3 above. We obtain your consent before doing so where applicable laws require us to obtain your consent or rely on legitimate interest. You can contact contact@thebukuapp.com to opt out of such sharing. We may ask you to provide some information to verify your identity before we stop sharing your data with our advertising partners.
- Law enforcement, regulators and others for legal reasons: If we are under a legal obligation, we may need to disclose your data to third parties such as law enforcement or regulators. We may also need to disclose your data to third

parties to protect our (or others) rights, property or safety or to detect or investigate illegal activity and any breaches of agreements we have with you.

- Business reorganisation: In the event of a sale, merger, liquidation, receivership or transfer of The Buku App's assets, we may need to share your data with the relevant third parties, which is in our legitimate interests in order to conduct our business and affect these transactions.

For more information on your marketing options please contact us at contact@thebukuapp.com

Information that cannot identify you

We don't disclose data that could be used to identify you to anyone else, except as mentioned in this Privacy Policy.

HOW LONG WE KEEP YOUR DATA

We will only keep your data for as long as we need it. If you have an account, this means we keep your data when your account is active. If your account is deactivated, we also keep your data for a reasonable period of time afterwards. We may also keep your data for legal or technical reasons.

We only keep your data for as long as we need it and for the purpose it was collected. This includes when we need to keep your data to comply with any legal, compliance, accounting or reporting requirements, or for the purposes of fraud prevention.

When we decide how long we need to keep your data for, we take into account the amount, nature, and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes we use your data for and whether we can achieve those purposes another way, and applicable legal requirements.

If you have an account with us, we will keep your data for as long as your account is active. If you deactivate your account, or we deactivate it because you have been inactive for a long time, your data will be kept for a period of time after your account has been deactivated.

After your account has been deactivated, we may also need to keep your data for legal or technical reasons (including back-up systems), for example to retain proof of transactions, so we can enforce our rights, and enable the other party to a transaction to access records of past purchases or sales. Following this period we will either delete the data or change it to a form that does not identify you, with or without notice to you.

If your account is deactivated, some of your data may persist and appear within the Service, for example where your data has been shared by other users of our Service. If your account has been banned, we will retain certain data about you to prevent you from opening a new account, in order to protect us, our users and the safety of our Service. For details of retention periods for other aspects of your data, please contact us at contact@thebukuapp.com

We may store information, which may include your data, locally on your device using Cookies and other methods.

YOUR RIGHTS

You have certain rights relating to the data we hold about you. If you make a request we may not be required to comply with it, but if that happens we will explain why. If you want to exercise any of your rights you can contact us at contact@thebukuapp.com.

- Right of access: You can ask to confirm the data we hold about you and to request a copy of that data.
- Right to correct your data: You can ask us to correct any data we hold about you if it is inaccurate or incomplete.
- Right to erasure: In certain circumstances you can ask us to erase your data. However, we may not always be required to comply with your request for specific legal reasons which will be notified to you, if applicable, at the time of your request. We may need to keep some information about you.
- Right to object: You can object to us processing your data where we are relying on a legitimate interest and you believe it impacts on your fundamental rights and freedoms. We will consider your objection but we may not be required to comply with your request, for example if we can demonstrate that our legitimate grounds override your rights and freedoms.

You can also object to us processing your data for direct marketing purposes

Right to restriction: You can ask us to suspend the processing of your 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.
- Where you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Right to request the transfer of your data: You have the right to request a transfer of certain of your data to you or a third party of your choice, which we will provide in a structured, commonly used, machine-readable format.
- Right to withdraw consent: If we rely on your consent to process your data, you can withdraw your consent at any time. For example, by changing the privacy settings on your social networks regarding information we collect from those networks.
- Automated individual decision making: You may have the right not to be subject to a decision that is based solely on automated processing of your personal data, where this produces a legal effect or similarly significantly affects you. However, this does not apply if the decision is necessary for

entering into or performing the contract with you, or where you have provided your explicit consent. Where you object to this type of decision making based on solely automated processing of personal data, you have the right to request human intervention, to express your point of view and contest the decision.

- Right to opt-out of behavioural analytics: We use technology (The's internal algorithm) to carry out behavioural analytics to display relevant sellers and items to you or to display your items to the most relevant potential buyers. If you do not want us to use your data to do this, you must close your Depop account and cease using our Service. This is because it is essential to how Depop works to suggest the right items and sellers to you and to display your items to the right buyers which we can only do by learning about your tastes and preferences and the types of products you list.

To exercise any of your rights, or if you have any questions about your rights, please contact us by emailing contact@thebukuapp.com. We may need to request specific information from you when you exercise your rights to confirm your identity and to speed up our response. We may not be able to fulfil your request if we are not able to identify you.

You can exercise these rights free of charge. However, in some circumstances we may be entitled to charge a reasonable fee, or refuse to comply with your request where we are permitted under law, for example if your request is unfounded, repetitive or excessive.

We try to respond to all valid requests within one month (once we have been able to verify your identity, if we need to). Sometimes it may take us longer than this if your request is particularly complex or you have made a number of requests. If this is the case, we will let you know if we need more time to respond.

Links to other websites

Our service may contain links to and from third party websites. These may include our partner networks, advertisers, partner merchants, retailers and affiliates. If you click on one of these links and visit these websites, these websites have their own privacy policies which you should read. We are not responsible for these third party's websites or privacy policies.

Children

Our Service is only available to users aged 13 or over.

The Service is not aimed at children under the age of 13. We do not knowingly collect data from anyone under the age of 13. If you are under the age of 13, you are not allowed to use our Service.

If you think a child under 13 has given us their data, please contact us using the details set out to contact@thebukuapp.com so we can remove this data and terminate the relevant account.

GET IN TOUCH

If you have any questions or want to make a request regarding your data, you can contact us at contact@thebukuapp.com. If you have any questions, comments or requests regarding this Privacy Policy you can contact us at contact@thebukuapp.com.

Data Protection Officer

In addition, if you have any questions, or if you would like to make a request to exercise one of your legal rights, you can contact our Data Protection Officer using the details below. A Data Protection Officer is someone responsible for overseeing how we comply with data protection laws and dealing with questions about this Privacy Policy or requests from you.

The Buku App LLC.

contact@thebukuapp.com

Changes to this Policy

We may update or make changes to our Privacy Policy from time to time. If we make material changes to this Privacy Policy, we will notify you of any such changes as described below.

How will we notify you?

If we need to tell you about something, which might be for a legal, marketing or other purposes related to our Service, we will contact you using the method we believe is best to get in touch with you.

We will usually do this by email, or placing a notice on the Service itself. You may convey your communication preferences by emailing us at contact@thebukuapp.com.