

PRIVACY POLICY FOR THE POOL

**IN RESPECT OF A HR TECHNOLOGY STARTUP, THE POOL FOR
THE POOL VENTURES LIMITED**

Effective Date: [Insert Date]

INTRODUCTION

This Privacy Policy is designed to inform users ("you" or "your") of The Pool Platform, which includes the app and website, about how we collect, use, and disclose personal information. Please take the time to read this Privacy Policy carefully to understand our practices regarding your data.

Should we ask you to provide certain information by which you can be identified when using our platform, then you can be assured that it will only be used in accordance with this privacy statement.

By using The Pool Platform, you consent to the terms of this Privacy Policy in addition to our Terms of Service. We encourage you to periodically review this Privacy Policy for any updates or changes.

Who are we

The Pool Platform, operated by The Pool Ventures Ltd ("the pool," "Company," "we," "us," and "our"), a company duly registered as a private company limited by shares under the Companies and Allied Matter Act 2020 with RC Number 7110713 and its registered address at 9, Louis Solomon Close, Victoria Island, Lagos State, Nigeria.

Personal Information We Collect

We collect various types of personal information when you use The Pool Platform to create a comprehensive profile and interact with the platform's features. The types of personal information we may collect include:

- **Identity Information:** This includes your first name, last name, gender, date of birth, username, and similar details as verified by official identification documents such as voter ID cards, NIN cards, International Passport or driving licenses.
- **Contact Information:** We collect your mobile number, postal address, email address, and telephone number to facilitate communication and provide services.
- **Professional Information:** To enhance your job search and help employers find you, we may collect details about your education, work experience, skills, salary, photos, city, and area.

Please be cautious not to include personal data in your resume that you do not wish to be publicly available.

- **Feedback and Correspondence:** If you participate in surveys, market research activities, or report issues with our service, we may collect information you provide during such interactions.
- **Usage Information:** We collect data about how you use The Pool Platform, including your interactions and engagement with the platform.
- **Marketing Information:** Your preferences for receiving marketing communications and details about your engagement with marketing materials.

Log Data and Cookies

When you use The Pool Platform, we collect Log Data automatically such as:

- IP address
- Device type
- Operating system type and version
- Interactions within the app
- App version
- Usage data, such as the date and time of your visit, the pages you view, and the duration of your visit

We may use cookies and other tracking technologies to collect this information. Cookies are small data files that are placed on your device when you visit our App. You can disable cookies through your device or browser settings, but doing so may limit the functionality of the App.

How We Use Your Information

- We use your personal information for various purposes, including but not limited to:
- Sending you updates on job opportunities via email.
- Logging your visits and interactions with The Pool Platform.
- Using data from your devices and networks, including location data when provided.
- Collecting additional information as needed to introduce new services to you.
- Monitoring usage and traffic patterns for user insights.
- Communicating directly with you, including sending information about new products and

services.

- Providing you with a personalized experience, which may include messages and tailor-made ads based on your interests and browsing history.
- Recording and monitoring communications to ensure compliance with legal and regulatory obligations.

How We Protect Your Information

We take appropriate measures to protect your personal information, including data collection, storage, and processing practices. We use commercially acceptable means to safeguard your data against unauthorized access, alteration, disclosure, or destruction. While we strive to maintain data security, please understand that no method of transmission over the internet or electronic storage is 100% secure. We cannot guarantee absolute security.

Information Sharing

We do not sell, trade, or rent your personal identification information to third parties. However, we may share generic, aggregated demographic information with trusted affiliates, business partners, and advertisers for analytical purposes. We use third-party services, and you can review their privacy policies for more information.

- We may disclose your personal information to:
- Our affiliates and group companies for internal business and administrative purposes and provision of career-enhancing services.
- Companies when you post jobs on The Pool Platform on their behalf.
- Candidates who have applied to jobs you've posted if their qualifications match your job requirements.
- Potential recruiters/job posters when your resume matches their job descriptions.
- Third parties including enforcement, regulatory, and judicial authorities when required to respond to legal processes, investigations, or protect against illegal activities or threats.
- In the event of mergers, acquisitions, or asset transfers, personal information may be disclosed to those involved in the negotiation or transfer.

Service Providers

We may engage third-party companies and individuals to facilitate and improve our service. These third parties may have access to your personal information to perform tasks on our behalf but are obligated not to disclose or use the information for other purposes.

One-to-One Messages

We have access to one-to-one messages for moderation and safety concerns. However, we do not share this data with third parties.

Security

We employ reasonable data collection, storage, and processing practices to protect personal information. However, we cannot guarantee absolute security, and you acknowledge the inherent risks of data transmission over the internet.

Links to Other Sites

The Pool Platform may contain links to external sites. We do not control the content, privacy policies, or practices of third-party websites. We recommend reviewing their privacy policies when accessing external sites.

Children's Privacy

The Pool Platform is not intended for users under the age of 18. We do not knowingly collect personal information from children under 18. If we become aware of such data, we will delete it promptly.

No Impersonation or False Information

You must use your actual name and provide accurate information on the platform. Do not falsely represent yourself or use false details. Misuse may result in account deletion and future platform access restrictions.

Trust and Safety

We take trust and safety seriously. Content promoting abuse, fraud, MLM/network marketing, job openings with fees, suicide, self-harm, or intended to shock or disgust users is not allowed. Strict action will be taken against violators.

Changes to This Privacy Policy

We may update this Privacy Policy from time to time. If we make material changes to this Privacy Policy, we will notify you by email or by posting a notice on the App prior to the effective date of the changes. We encourage you to periodically review this Privacy Policy to stay informed about how we

are protecting the information we collect. Your continued use of the App after the effective date of any changes to this Privacy Policy constitutes your acceptance of the revised terms. If you do not agree with the terms of the revised Privacy Policy, you may choose to discontinue using the App.

Handling Payments

Unless otherwise specified, payments are made by debit card, bank transfer or other means via external payment service providers. In general and unless otherwise stated, users are requested to provide their payment details and personal information directly to such payment service providers. We aren't involved in the collection and processing of such information: we will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

The Rights of Users

Users may exercise certain rights regarding their Data processed by the Us.

In particular, Users have the right to do the following, to the extent permitted by law:

- I. Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- II. Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- III. Access their Data. Users have the right to learn if Data is being processed by the us, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- IV. Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- V. Restrict the processing of their Data. Users have the right to restrict the processing of their Data. In this case, We will not process their Data for any purpose other than storing it.
- VI. Have their Personal Data deleted or otherwise removed. Users have the right to obtain the

erasure of their Data from the Us.

- VII. Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- VIII. Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

Additional information about Data collection

Legal action

The User's Personal Data may be used for legal purposes by Us in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that We may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Platform may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Platform (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Us at any time. Please see the contact information at the end of this document.

Definitions and Legal references

I. Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

II. User

The individual using this Platform.

Contact Us

If you have any questions about this Privacy Policy or our treatment of your personal information, please contact us at support@jointhepool.com.

Thank you for using The Pool Platform.