

Privacy Policy

1. Introduction

Welcome to the Legal Tech Hackathon (*Hackathon*) website operated by Arravo Limited in partnership with Perchstone & Graeys LP (hereinafter referred to as *The Partnership*). The Hackathon is an exciting event that brings together tech-savvy individuals who possess the necessary technical expertise to innovate and transform the Nigerian legal industry using Artificial Intelligence (AI).

This Privacy Policy outlines your privacy rights concerning the collection, use, storage, sharing, and protection of your personal information on our website and with third parties. If you have any questions about this policy, please reach out to us at *please insert contact information*.

The terms 'you' or 'User' refer to anyone who visits or uses our website, while "we", "our" or "us" means the Partnership, which will be responsible for the collection and use of your personal data as defined under this Privacy Policy.

Age restriction: Our website and services are not intended for individuals under the age of 18, or the applicable age of majority in their country. We do not knowingly collect personally identifiable information from anyone under the age of 18. If a person below the age of 18 wishes to use our website, they must do so under the supervision of a legal guardian.

Third-Party Privacy Policy: This Privacy Policy pertains solely to our website only. We do not control external websites integrated into or displayed on our website. These third-party sites may collect personal information through cookies, plug-ins, or other means. We are not responsible for the privacy statements or practices of these third-party websites or platforms. Please review their privacy policies before proceeding.

Policy Updates: This Privacy Policy may be changed, amended, updated or altered as required by business demands and regulations. Any revision will become effective upon posting on our website. We may provide notifications regarding the Privacy Policy, its revisions, or the collection of personal data by posting them on our website or contacting registered users via the email address provided.

2. Definitions:

Data/Information: refers to any personal information that pertains to you, including but not limited to your name, identification number, location data, online identifier address, photo, email address, pins, passwords, licenses, bank details, date of birth, health, criminal records, medical information, and other unique identifiers such as but not limited to Media Access Control (MAC) address, Internet Protocol (IP) address, International Mobile Equipment Identity (IMEI) number, International Mobile Subscriber Identity (IMSI) number, Subscriber Identification Module (SIM) and others.

Commented [P&G1]: To make this Policy shorter, you may consider using a collapsible cursor. We advise that this privacy policy must contain an icon for clicking "accept" for users to indicate their consent, and such acceptance must be stored by Arravo.

Commented [PG2]: We understand it is supposed to be webpage in the Arravo's website. Is it intended that this webpage has its own separate policies? Should we refer to it as webpage?

Commented [P&G3]: This is a temporary title pending the execution of an agreement by both parties and the creation of a name for the partnership between Perchstone & Graeys and Arravo.

Commented [P&G4]: Please insert email

This identification also encompasses factors specific to your physical, physiological, genetic, mental, economic, cultural, or social identity.

Cookies: Cookies are small data files that are transferred to your computer or mobile device. They allow us to remember your account log-in information, IP addresses, web traffic, number of visits, browser type and version, device details, and the date and time of visits.

Process/Processing: refers to any operation or set of operations that are performed on your Personal Data or sets of Personal Data, whether through automated means or not. These operations include collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.

3. The Personal Data we collect and how we collect them.

We only collect the necessary information to provide our services (specifically, the Hackathon) to you as User. This includes:

- a. **Data you directly provide to us.** We collect this information when you create an account with us or update your account details. When you register for the Hackathon on our website, we collect the identity data such as your full name, government issued identification, date of birth, address, gender, religion, titles, descriptions, images, emails, and phone numbers.

Additionally, we collect communication information when you contact us for inquiries or support. Please be aware that for quality assurance purposes, telephone conversations may be monitored or recorded without prior notice.

- b. **Data collected automatically.** When you use our website or services, we automatically collect device information and usage data. Our servers record information that your browser sends when visiting our website, such as clicked links, your device's IP address, browser version length of visit on specific pages, unique device identifier, login information, location and other device details. For more information on our use of Cookies and how you manage them, please refer to our [Cookies Policy](#).

- c. **Data received from third parties.** We may obtain additional personal data about you from third parties verification services and other service providers. This may be combined with the information we already have about you. Additionally, we may collect your personal data from public sources of information like open government databases, and we may infer additional Personal Data based on the information described above. For example, for website visitors, we may infer your interests from the webpages you view.

Commented [PG5]: Please confirm.

Commented [P&G6]: This should be a link to the Cookies Policy.

4. **How we use your Personal Data**

We use the personal data that we collect for the following purposes:

- Assisting in the creation, verification, and management of user accounts.
- Sending relevant notices related to the Hackathon, website usage, and new features, including necessary security updates for optimal implementation.
- Providing, administering, and communicating with you regarding products, services, offers, programs, and promotions through email, telephone calls, or other electronic forms of communication.
- Detecting, preventing, and managing risks associated with fraud and illegal activities utilizing both internal and third-party screening tools.
- Improving website features, content, and performing data analysis to develop enhanced products and services.
- Sending marketing content, newsletters, and service updates carefully curated by us. However, we will always provide you with the option to unsubscribe if you prefer not to receive such communications.
- Verifying your identity and the information you provide in accordance with our statutory obligations to maintain Know Your Customer (KYC).
- Maintaining up-to-date records of users and visitors to our website.
- Resolving disputes or complaints that may arise, including cooperating with investigations conducted by law enforcement or regulatory bodies.
- Monitoring website usage.
- Fulfilling any other purpose that we disclose to you during the Hackathon process.

5. **Lawful basis for processing your personal information:**

Our processing of your personal information is considered lawful if:

- We have obtained your explicit consent to process your personal information for one or more specific purposes.
- The processing is necessary for the execution of a contract with us, to which you are a party, or to take necessary steps at your request prior to entering into a contract.
- Processing is necessary for compliance with a legal obligation to which we are subject.
- Processing is necessary to protect your vital interests or those of another natural person.
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of an official public mandate vested in us.

6. **Sharing your Data**

In order to support the Hackathon, establish and maintain business relationships with you, comply with financial, regulatory, and other legal obligations, and pursue our legitimate business interests, we may share or utilize your personal data. Rest assured, we

will not share or disclose your personal data to any third party without your consent, except as necessary to provide our services to you or as described in this Privacy Policy.

Here are the scenarios in which we may share your personal data:

- **Service providers:** We may share your personal information with agents, service providers, or partners who work on our behalf (such as identity verification agencies and payment processing, where applicable), to help address any issues you may encounter. Our relationship with these service providers and partners is governed by a contract and confidentiality agreement to ensure the adequate protection of your personal data, in line with the terms outlined in this Privacy Policy.
- **Affiliates:** We may grant access to personal data to our subsidiaries, affiliates, and related companies for purposes outlined in this privacy policy. This may include cases where we share common data systems or when access is required to provide our services and operate our business.
- **Corporate transactions:** In the event of a corporate transaction or legal proceeding, such as a merger, financing, acquisition, bankruptcy, dissolution, or a transfer, divestiture, or sale of all or a portion of our business or assets, we may disclose personal data as necessary.
- **Security, safety, and protection of rights:** We will disclose personal data if we believe it is necessary to protect our users or maintain the security of our services and platform. This includes situations where we need to prevent or stop an attack on our computer systems or networks, or to protect our rights or property or the rights and property of others.
- **Fraud Prevention and Risk Management:** We may share your personal data when necessary to help prevent fraud or assess and manage risk. This includes instances where we detect fraudulent activity on your accounts or evaluate credit risk.
- **Compliance and prevention of harm:** We share personal data as we believe it is necessary to comply with applicable laws or rules, enforce our contractual rights, protect our services, rights, privacy, safety, and property, or respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities.
- **Third-party analytics and advertising companies:** Please note that these companies may collect personal data through our website and apps. This may include marketing and communications data, demographic data, content and files, geolocation data, usage data, etc. Please note that the collection and usage of this data by third-party analytics and advertising companies are governed by their own separate Privacy Policy.

7. Cookies

In order to track the activity on our service and store certain information, we use cookies and similar tracking technologies. For more detailed information on how Cookies work, and how you can control them, please refer to our [Cookies Policy](#).

Commented [P&G7]: Please insert link

8. How We Protect Your Information

We are dedicated to managing your personal information in accordance with global best practices. To reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration, we implement physical, technical, and administrative security measures. Additionally, we utilize industry-recommended security protocols, data encryption, firewalls, physical access controls to our premises and files, and limit access to personal information to only those employees who require it to fulfill their job responsibilities. We have a data breach procedure in place to handle any incidents that may occur.

If you notice or suspect any breach or compromise of your personal information or access credentials, please contact our [Data Protection Officer](#) immediately. Reporting any breaches that compromise your rights and freedoms to the relevant regulatory authority is also a priority, as we will do so within 72 hours of discovering the breach.

Commented [P&G8]: This should be an email link.

Aso, Arravo should have an employee designated as a Data Protection Officer in line with the relevant provision of NDPA 2023.

9. Your Data Protection Rights

You have certain rights regarding the Personal Data we control about you:

- Confirmation and access: You can request confirmation as to whether we process Personal Data related to you, and, if so, to request a copy of that Personal Data.
- Rectification: You can request correction or updating of any inaccurate, incomplete, or outdated Personal Data.
- Erasure: In specific circumstances, such as when the data is no longer necessary, you can request the erasure of your Personal Data. However, please note that legal requirements may compel us to retain certain data.
- Restriction: In certain circumstances, you can request that we limit the use of your Personal Data. This means that your data can only be used for specific purposes, such as exercising legal rights
- Data portability: Where technically feasible, you can request that we export the Personal Data you have provided to us to another company.
- Marketing communications: You have the right to object to the processing of your Personal Information for marketing purposes. You can adjust your preferences on the settings page or click the unsubscribe link in our marketing emails.
- If you prefer, you can object to automated decision-making and processing and request for human review of the decision.
- The basis for processing your Personal information is your consent, which you can withdraw at any time to prevent further processing of your Personal Data. Please note that if you object to the processing of your Personal Information, we may not be able to provide our Services to you.
- If you have an account with us, you can easily review and update your Personal Information in your User Account settings. Additionally, you have the option to close your user account at any time, although this may affect your registration or

Commented [P&G9]: Please confirm this

participation in the Hackathon. Please refer to the Terms of Use Conditions for more information.

- To exercise any of these rights, please write to us at [Please insert contact information.](#)

Commented [P&G10]: Please insert email

10. Storage Limitation

We will retain your information for as long as it is reasonably necessary to provide our services to you. This includes the duration your active account with your consent. In the case of disputes, we will retain the data until the claim is resolved, or it expires.

We are also obliged to retain your data to comply with legal, accounting, statutory, regulatory, administrative, and operational requirements. However, where possible, we will either securely destroy your personal data or anonymize it.

11. Transfer of Personal Data

While providing our services, it is possible that we may rely on third-party servers, and databases located in foreign countries. This means that your personal data may be transferred to computers or servers in these foreign countries. Any transfer of Personal Information outside of Nigeria must comply with relevant data protection regulations. We will only transfer your Personal Information if one of the following conditions is met:

- If we have obtained your consent to do so.
- The transfer is necessary for the Hackathon, for the performance of a contract between us, or for pre-contractual measures taken at your request.
- The transfer is necessary to conclude a contract in your interest with a third party.
- The transfer is necessary for reasons of public interest.
- The transfer is necessary for the establishment, exercise, or defense of legal claims.
- The transfer is necessary to protect your vital interests as a data subject or in cases where you are physically or legally incapable of giving consent.

Regardless of the condition, we will ensure that your Personal Information is transmitted securely and safely.

12. Policy Violations

Any violation of this Privacy Policy should be reported to the Data Protection Officer for proper handling and appropriate consequences. By signing up on our website, you confirm that the information you provide during registration is accurate to the best of your knowledge. It is your responsibility to update this information as necessary. Additionally, when providing the personal data of another individual, you confirm that you are only sharing accurate and up-to-date data in accordance with their instructions. You must be able to provide evidence of their consent to the data processing described in this Policy if required by us. Please note that any attempt to mislead or provide inaccurate data may result in prosecution if it leads to a violation of data privacy.

13. Dispute Resolution

We are committed to ensuring your satisfaction with how we handle your information. However, in the unlikely event that you have a complaint, please contact us using the details below and provide your name and details of your complaint. Upon receiving your complaint, we will make every effort to reach out to you and resolve the issue amicably as quickly as possible. In the event of a dispute arising from this Policy, we will first attempt to resolve it through amicable negotiation. If we are unable to reach a resolution through mutual consultations, we will further strive to resolve the dispute through Mediation using a mediator agreed upon by both parties or by referring the matter to the Lagos State Multi-Door Courthouse (“LMDC”). Any decisions or awards made by the LMDC will be binding on both parties. Each party will bear their respective costs related to the mediation.

14. Contacting our Data Protection Officer (DPO)

If you have any questions about this Privacy Policy or any complaints, or if you would like to know more about exercising your data privacy rights, please contact our Data Protection Officer via:

Physical address: [\[Please insert\]](#)

Email: [\[Please insert\]](#)