

Privacy Policy

Introduction

Blip Limited (“Urban” or “Us” or “We” or “Our”) is a limited liability company incorporated under the laws of the Federal Republic of Nigeria, with registration number 1915983 and having its registered office address at Plot A10, Persian Garden Estate, Lokogoma, FCT-Abuja. We are dedicated to protecting the confidentiality and privacy of personally identifiable information entrusted to Us (“Personal Data”). As part of that fundamental obligation, We are committed to protecting the use of the Personal Data which We collect on <https://www.urban.ng> and Urban’s application software (the “App”). The App is an information and booking reservations platform for mobility, transportation and chartering of vehicles (“Services”). This privacy policy (“Privacy Statement”) sets out the basis upon which We will process, store, and disclose any Personal Data that is provided voluntarily by users of the App (“Data Subject” or “you” or “your”) in connection with the Services that We offer.

We note that the Nigeria Data Privacy Regulations (NDPR) distinguishes between entities that are “controllers” of Personal Data and entities that “process” Personal Data. We note that We are a “Data Controller” where We determine the purposes for and the manner in which Personal Data is processed or is to be processed and We are a “Processor” for those Services where We only use Personal Data that is requested by other Data Controllers.

Where We make decisions on how Personal Data is used in connection with Our Services (where We are acting as a controller), We are responsible for the obligations of a “Controller” under the NDPR in connection with the processing of Personal Data – for example, We use this Privacy Statement and other notices to provide you with information about Our use of personal information, as required by the NDPR. Where We only use Personal Data requested by other Data Controllers (where We are acting as a processor), those other Data Controllers are similarly responsible for the obligations of a “Controller” under applicable laws in connection with the processing of personal information, and, if you are using Our Services through those other Controllers, you should contact them if you have questions or concerns about the processing of your personal information or compliance with the NDPR and other applicable laws.

This Privacy Statement may change from time to time. Unless otherwise stated, any updates to this Privacy Statement become effective when We post the updates on Our website and App. Your continued use of the App for Our Services following an update to the Privacy Statement means that you accept the updated Privacy Statement.

Your Privacy Rights

This Privacy Statement describes your privacy rights regarding Our collection, use, storage, sharing and protection of your Personal Data. It applies to Our website, App and all other

related applications, services, tools and physical contact with Us regardless of how you access or use them.

You have the following rights:

right to request from Us access to and rectification or erasure of your Personal Data;

right to restrict processing or object to processing of your Personal Data;

right to data portability;

right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;

right to lodge a complaint with the relevant authority.

In the event that you wish to: (i) access your Personal Data processed by Us in accordance with this Privacy Statement; (ii) ask any questions at all regarding Our use of your Personal Data; (iii) rectify your Personal Data processed by Us in accordance with this Privacy Statement; (iv) restrict or object to the processing of your Personal Data; (v) withdraw your consent to Our processing of your Personal Data; or (vi) request for data portability, please reach out to Us at hello@urban.ng.

We carefully analyze what types of Personal Data We need to provide Our Services, and We try to limit the Personal Data We collect to only what We really need.

Where possible, We delete or anonymize Personal Data when We no longer need it. We will retain your Personal Data for the duration of Our Services to you and afterwards for as long as is necessary and relevant for purposes permitted by applicable laws and regulations. Where We no longer need your Personal Data, We will dispose of it in a secure manner.

If you have created a username, identification code, password or any other piece of information as part of Our access security measures, you must treat such information as confidential, and you must not disclose it to any third party. We reserve the right to disable any user identification code or password, whether chosen by you or allocated by Us, at any time, if in Our opinion you have failed to comply with any of the provisions of these conditions. If you know or suspect that anyone other than you know or has access to your security information, you must promptly notify Us at hello@urban.ng.

Your Consent

Please read this Privacy Statement very carefully. If you do not wish to be bound by the provisions of this Privacy Statement, you should not access the App or sign up for Our Services. By using the App, and by signing up for Our Services, you hereby confirm that you have read, understand, and agree to be bound by the Privacy Statement.

Additionally, please note that the option to sign up on the App is intended solely for persons who are 13 (thirteen) years of age or older, and any registration by, use of or access to the Services by any person under 13 (thirteen) is unauthorized and in violation of this Privacy Statement. Urban does not knowingly collect Personal Data from children under the age of 13 (thirteen). We therefore also ask you, if you are under the age of 13 (thirteen), please do not send us or submit your Personal Data.

You hereby give Us consent to the collection and processing of your Personal Data for the purpose of providing the Services. You hereby certify that all the information provided by you are true and correct and that any misrepresentations or falsity, whether intentional or not, therein will be considered as an act to defraud Us and Our partners. You authorize Us to verify and investigate the above statements/information as may be required, from the references provided and other reasonable sources. For this purpose, you hereby waive your rights on the confidentiality of client information and expressly consent to the processing of any Personal Data and records relating to you that might be obtained from third parties, including government agencies, your employer, business associates, and other entities.

What Kind of Personal Data Do We Collect?

This section details the Personal Data We may collect about you. We explain why, and how, We use it in later sections. If you decide to create an account or enquire about one of Our products or Services, We'll ask You to provide Us with some specific information, for example: Basic personal details – such as name, surnames, passport photograph, age, gender and date of birth; Personal contact details – such as home address, home phone number, mobile phone number, and email address; Work details – such as job title, department, company name, company address; Log in details – such as username and password; Usage Information and Browsing History - such as usage metrics (including usage rates, occurrences of technical errors, diagnostic reports, settings preferences, content and advertising interactions; banking details –account number; Service details – such as pickup location and destination. We may also collect additional information involving Your opinion of Our products and Services and Your preferences regarding other services such as newsletter subscription, preferred routes, and commuting frequency.

Information about your computer and mobile device hardware and software may be automatically collected by Us. This information can include: your IP address and location, browser and device name, type and version, operating system type and version, language preferences, domain names, the information you search for on the Services, access times and dates, referring website addresses and other statistics. This information is used for the operation of the Service, to maintain quality of the Service, and to provide general statistics regarding use of the App.

Please keep in mind that if you directly disclose Personal Data through Urban public message boards, this information may be collected and used by third parties.

Our website and App may contain links to other resources not owned or controlled by Us and as such, We encourage you to review the privacy statements of websites you choose to link from Our website and App so that you can understand how those websites collect, use and share your information. Please bear in mind that Urban is not responsible and will not be liable for the privacy practices or other content of such other resources or third parties.

What is the Source of Personal Data We Collect?

We may collect Personal Data about you either directly from You, from certain third parties (such as your employer or the subscriber providing access to Our Services), or from other sources (such as publicly available sources) when you:

Search for, subscribe to Our Services.

Use Our Services or otherwise interact with Us.

Create or maintain a profile or account with Us.

Purchase, use, or otherwise interact with content, products, or services from third party providers who have a relationship with Us.

Create, post, or submit user content on Our Services.

Register for or attend one of Our events or locations.

Request or sign up for information.

Communicate with Us by phone, email, chat, in person, or otherwise.

Complete a questionnaire, survey, support ticket, or other information request form.

When you express an interest in working with Us or apply for a job or position with Us.

In some circumstances, We may collect Personal Data about you from Our partners or from publicly available websites to help Us better understand Our audience and enhance the relevance of Our content. We collect Personal Data about you from third parties, such as:

Your organization and others with whom you have a relationship that provide or publish Personal Data related to you, such as from Our customers when they arrange access to Our Services for you or from others when they create, post, or submit user content on Our Services that may include your Personal Data.

Professional or industry organizations and certification/licensure agencies that provide or publish Personal Data related to you.

Third parties and affiliates who resell or integrate with Our Services.

Service providers and business partners who work with Us in relation to Our Services and that We may utilize to deliver certain content, products, or services or to enhance your experience.

Government agencies and others who release or publish public records.

Other publicly or generally available sources, such as social media sites, public and online websites, open databases, the corporate affairs commission, and data in the public domain.

We use cookies (and similar technologies) and analytics tools to collect information about You. This information can be used to improve the performance of the site, make advertising more relevant and enhance your user experience, such as Your location – We use cookies to display information that is most relevant to your location. Your usage – We use cookies to understand how Our customers use Our App and interact with Our communications. For example, We use technology on Our App, which records user movements, including page scrolling, clicks and text entered. (It does not record payment details). This helps Us to identify usability issues and improve the assistance We can provide to users and is also used for aggregated and statistical reporting purposes. Your device – We use cookies to understand what type of device you are using to show you the best version of the site. For instance, if you visit Our website on a mobile device, Our technology will ensure that you see a version that is optimized for mobile viewing and interaction. Your engagement with advertisements – We use cookies to understand what advertisements you have been shown, or clicked on, to bill Our advertising partners, and to present you with advertisements that are more relevant to you.

Cookies are small files placed on your computer's hard drive that enables the website and App to identify your computer as you view different pages. Cookies allow websites and applications to store your preferences in order to present contents, options or functions that are specific to you. Like most interactive websites, Our website uses cookies to enable the tracking of your activity for the duration of a session.

Lawful Basis for Processing

We only process Personal Data where We have a lawful basis for doing so, such as the following:

User consent – This is where you have given Us explicit permission to process Personal Data for a given purpose. For example, if you create a profile on Our App, We may additionally ask you to consent to Us processing your Personal Data.

Contractual necessity – This is where We have to process Personal Data to meet Our contractual obligations.

Legal obligation – This is where We have to process Personal Data in order to comply with the law.

Protection of vital interests – This is where We are constrained to process your Personal Data in order to protect your interests or those of another person, such as to prevent identity theft.

Public interest – This is where there is an overriding public interest, or We have been vested with an official public mandate to take certain action in the interest of the public.

Legitimate/Commercial interest. This is where We process Personal Data in order to protect Our legitimate/commercial interest.

How Do We Use Your Personal Data?

Urban acts as a Data Controller when using your Personal Data in providing you with Services. We use Personal Data about you in the following ways:

to provide you access to Our Services;

to improve and maintain performance of the App, by ensuring that the content on the App is presented in the most effective manner for you;

to provide you with data about services that you request from Us or which We feel may interest you, where you have consented to be contacted for such purposes;

for statistical analysis or market research;

to develop and improve Our Services;

to update Our records;

to detect, investigate, prevent, or tackle illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of Data Subject;

to ensure Our compliance with Our policies, terms, and other applicable laws and regulations;

to respond to inquiries and offer support to you;

to request your feedback and improve your user experience;

to carry out Our obligations arising from and exercise Our rights under any agreements between you and Us;

to allow you to participate in interactive features of our Services, when you choose to do so;

to notify you about changes to Our Services or potential new services that We may offer;

to provide you with customer service;

for any legitimate business Interest;

recruitment – If you apply for a role via one of Our sites, We will process your information in order to facilitate the application process;

to process and assess your application for employment with Us; and
in any other way that you have specifically consented to.

Urban does not sell, rent or lease its customer lists to third parties.

Urban may, from time to time, contact you on behalf of external business partners about a particular offer or update that you may be interested in. In these cases, your Personal Data will not be not transferred to such third party. Urban may share your Personal Data with trusted partners (we rely upon to assist in the operation of the Services available to you) to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using and exploiting your Personal Data except to enable Urban provide the Services to you, and they are also required to maintain the confidentiality of your Personal Data.

Urban may keep track of the websites and pages its users visit within Urban, in order to determine what Urban's services are the most popular and appealing to users. This data is used to deliver customised content and advertising within Urban to users whose behavior indicates that they are interested in a particular subject area.

Who We share your Personal Data with?

We do not share Personal Data with unaffiliated third parties, except as necessary for Our legitimate business interest, to provide you with Our Services, and/or as required or permitted by law or professional standards and generally to facilitate the running of Our business or to provide specific services you have requested. We would only transfer Personal Data to the following categories or situations, when they meet Our strict standards on the processing of data and security. We only share Personal Data that is necessary for them to provide their services. Urban will not transfer your Personal Data to any third parties for their own direct marketing use except as stated herein. Commonly, We may share your Personal Data with:

Service providers – We engage service providers who help to support Our business and improve Our products. These service providers may include payment processors, customer service agencies, hosts, organizers and sponsors of Our events; organizations that host Our website, App or databases and providers of online surveys. We have contracts in place with these data processors and they can only use your Personal Data under Our instruction.

Advertisers – We, and Our advertising partners, use cookies to collect Personal Data and serve you with advertisements that We believe are relevant to you and your interests.

Audits - disclosures of Personal Data may also be needed for data privacy, financial or security audits and/or to investigate or respond to a complaint or security threat.

Legal processes and successors in title – We, and Our suppliers, may also disclose your Personal Data to comply with applicable laws, court orders or other valid legal processes, and to enforce or apply Our terms of use, any subscription agreement, or any of Our other

rights. We may transfer or disclose your Personal Data to any entity which takes over or acquires the relevant Shuttlers company. We also share aggregated, non-identifiable information with third parties. Before sharing this information, We ensure that it cannot identify you as an individual. For example, We may share information about the size and growth of Our customer base with investors.

How long do we retain your Personal Data?

We retain your Personal Data for as long as your account is active and therefore open; this allows you to continue accessing Our content, products and Services.

If you become inactive and are not a subscriber, We retain your Personal Data only for the period within which it is reasonably needed and may delete elements of your Personal Data associated with your account. We will normally warn you if your access is going to be withdrawn and give you the opportunity to retain your account.

Where We don't need to keep all of your Personal Data in full, We may obfuscate or aggregate it, for example, web activity logs and survey responses. This is to ensure that We do not retain your Personal Data for any longer than is necessary.

It is sometimes necessary for Us to keep your Personal Data for longer periods of time, for example:

If there is a statutory requirement to retain it;

If We require the Personal Data for legal reasons or there is a legitimate business need for Us to retain same;

To ensure We do not contact you if you have asked Us not to; and

To use aggregated data derived from incorporating your Personal Data after your user account becomes inactive, but not in a manner that would identify you personally.

How Do We Secure and Store Personal Data?

We employ all reasonable efforts to keep your Personal Data secure by taking appropriate technical and organizational measures against its unauthorized or unlawful processing and against its accidental loss, destruction or damage. We store and process your Personal Data on Our computers in Nigeria. Where We need to transfer your Personal Data to another country, We would take reasonable steps to ensure that such country has an adequate data protection law. You hereby consent to the transfer of your Personal Data to countries which may not be on the white list specified by the NDPR where such transfers become expedient for us. We protect your Personal Data using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards We use are firewalls and data encryption, physical access controls to Our data centers, and information access authorization controls.

However, no data transmission over the internet or wireless network can be 100% guaranteed. Therefore, whilst We strive to protect your Personal Data, you acknowledge that: there are security and privacy limitations of the internet which are beyond Our control; the security, integrity, and privacy of any and all information and data exchanged between you and Us cannot be 100% guaranteed; and any such information and data may be viewed or tampered with in transit by a third party, despite Our best efforts.

Data Breach

In the event We become aware that the security of Our Services have been compromised or users' Personal Information have been disclosed to unrelated third parties as a result of an external activity, including, but not limited to, security attacks or fraud, We reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, We will make reasonable efforts to notify affected individuals if We believe that there is a reasonable risk of harm to the user as a result of the breach.

Opt-Out & Unsubscribe

We respect your privacy and give you an opportunity to opt-out of receiving announcements of certain information. You may opt-out of receiving any or all communications from Shuttlers by contacting Us at hello@urban.ng.

What Happens When You Provide Us With Information About Others?

If you provide Us with Personal Data about another individual, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protection laws in relation to such disclosure. Insofar as required by applicable data protection laws, you must ensure that you have provided the required notices and have obtained the individual's explicit consent to provide Us with the information and that you explain to them how We collect, use, disclose and retain their Personal Data or direct them to read Our Privacy Statement

For general enquiries regarding this Privacy Statement, or to make a request or complain about how We process Personal Data, you may contact Us at:

Plot A10, Persian Garden Estate, Lokogoma, FCT-Abuja.

hello@urban.ng

Phone: +234 (0)9019195291