

## **Introduction**

This privacy and cookies policy ("Privacy Policy") details data used on [www.munnyfinds.com](http://www.munnyfinds.com) (the "Websites"), the Munnyfinds Customer mobile application software and the Munnyfinds Business Partners Connect which is available for download from iTunes and Google Play (the "Apps"), customizable websites hosted at unique subdomain addresses, and the web interfaces, embedded on Partner Sites and on our salon partners ("Partners")' own websites and social media pages, through which customers can make bookings directly with Partners (together, the "Platform").

The data controller for your information is MUNNYFINDS (registered address: No 4B, Ogidi Crescent, Lekki Phase 1, Lagos State, Nigeria.) ("Munnyfinds", "we", "our" or "us"). You can email us on: [info@munnyfinds.com](mailto:info@munnyfinds.com)

Munnyfinds. shares your personal information with other entities in its corporate group ("Group Companies") for the purposes described in this notice. The Group Companies also process your personal data as data controllers as necessary for the purposes described in this notice. The Group Companies are listed in the section of this Privacy Policy called "Sharing personal information with third parties", along with their contact details.

We are committed to protecting the privacy of our users and customers. This Privacy Policy is intended to inform you how we gather, define, and use information that could identify you, such as your name, email address, address, other contact details or online identifiers, other information that you provide to us when using the Platform ("Personal Information") and what Cookies we use. Please take a moment to read this Privacy Policy carefully.

## **What information do we collect?**

When you visit and/or use our Platform or contact us, we may collect the following information:

- Personal Information that you choose to share with us when you register for an account, subscribe to emails, newsletters, and alerts and which you provide to us when using our services, including information entered our booking platform and included in your comments, reviews, or survey responses. In the course of making a booking or submitting reviews, you might voluntarily provide us with sensitive personal data if relevant to the service that you are requesting or reviewing (relating to your health or ethnicity, for example).
- Personal Information that you share with us as part of an application for a job at Munnyfinds, submitted either directly on the Websites or indirectly, including but not limited to, via a recruitment agency, unsolicited application, or third-party recruitment platform. In the course of making an application you may choose to voluntarily provide us with sensitive personal data relating to whether reasonable adjustments ought to be made for you in the application process or subsequently if an employment relationship is established. However, you must not share any sensitive personal data with us that would not be necessary for us to

make reasonable adjustments for you, e.g. political opinions, religious beliefs or specific information on your state of health.

- Where you are utilizing our online payment facility, we may store (via ourselves or our appointed payment processor) your credit and debit card details on a secure encrypted basis.
- If you choose to communicate with us (for example, through the Platform, email, telephone, SMS, or social media) we will record the fact that you have contacted us and may retain the content of your communication, together with your contact details and our responses.
- Information about your visits to and use of the Platform, such as information about the device and browser you are using, your IP address and location, your identifier for advertisers (IDFA), the date and time that you visited, the duration of your visit, the referral source and website navigation paths of your visit and your interactions on the Platform including the salons and treatments you are interested in. Please note that we may associate this information with your Munnyfinds account. Please see the cookies section of this Privacy Policy for further information on the purposes for which we collect and use this information.

It is important that all the Personal Information you give us when you register as a user or otherwise when you use the Platform is correct and accurate. This includes, by way of example only, ensuring that we have your correct contact (always including email) details.

If you plan to submit someone else's Personal Information to us, for instance when making a booking on their behalf, you should only provide us with that third party's details with their consent and after they have been given access to information about how we will use their details, including the purposes set out in this Privacy Policy.

### **Protecting your personal information**

The transmission of information via the internet is not completely secure. So, whilst we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our Platform. Any transmission is at your own risk. Once we have received your Personal Information, we will use strict procedures and security features in relation to that data.

### **How do we use your personal information?**

In general terms, we use Personal Information to provide you with the services and products you request, process payment, provide customer services, deliver our content and ads which we think may be of interest to you, for customer research, to send you marketing and promotional emails and to notify you about important changes to our Platform.

We also use your Personal Information for the following purposes:

- To fulfil a contract, or take steps linked to a contract. This is relevant when you request a service via Munnyfinds. This includes:
- Sending you information about your requested services (such as appointment reminders) by email, SMS and push notification
- Facilitating your bookings and taking payments
- Responding to your questions and concerns
- Administering your account

\*As required by Munnyfinds to conduct our business and pursue our legitimate interests, in particular:

- To keep our Platform and systems secure and to prevent fraud, security incidents and other crime
- To verify compliance with our terms and conditions and for the establishment, exercise, or defense of legal claims
- To notify you about new Munnyfinds services and special offers we think you will find valuable, for example via email and displaying advertising on third party websites such as Facebook (where consent is not required)
- To tailor and personalize marketing notifications and advertising for you and others based on information you provide and your use of our Platform, products and services and other sites (please see the Cookies section of this Privacy Policy for further information)
- To help us monitor, improve, and protect our Platform, products and services, and to personalize our Platform, products, services (and those of our partners) for you, based on information you provide and your use of our Platform, products and services and other sites (please see the Cookies section of this Privacy Policy for further information)
- To investigate and respond to any questions or complaints received from you or from others, about our Platform or our products or services
- To conduct internal research and analysis so that we can see how our Platform, products and services are being used and how our business is performing
- To conduct market research and consumer surveys
- To collate and publish reviews of products or services offered by our Partners, and use these for advertising campaigns
- To process applications for a position at Munnyfinds, whether submitted directly or indirectly, including to examine your suitability for the role, curriculum vitae, and

professional skills, to schedule interviews and assessments, to contact referees and, if successful, to offer you a job and establish an employment relationship with you..

- Information which you provide will be held for a period of 12 months and may be referred to in the event you make future applications to work at Munnyfinds, unless you opt to delete this data which you may do so by following the link in the confirmation of application email that we sent you.

#### **Where you give us consent:**

- To notify you about new Munnyfinds services and special offers we think you will find valuable, for example via email and displaying advertising on third party websites such as Facebook (where consent is required)
- To send you information about competitions and surveys and details of promotional offers of our Partners and about other selected third parties' goods or services, for example those of health, beauty, leisure, and lifestyle brands, by email and as push notifications via the App
- To pass your personal information to our Partners and other selected third parties', for example health, beauty, leisure, and lifestyle brands, to enable them to send you information about their goods and services on their own behalf
- To place cookies and use similar technologies in accordance with the Cookies section of this Privacy Policy and the information provided to you when those technologies are used
- To use customer communications for training, record-keeping, and quality control purposes. If you telephone our customer experience team, and consent by opting in, your call may be recorded. You will be told if such a recording is being made and asked to opt-in to being recorded to show your consent and the means for doing so.
- On other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time

#### **\*For purposes which are required by law:**

- To respond to requests by government or law enforcement authorities conducting an investigation
- To meet legal, regulatory and compliance requirements

#### **Legitimate Interests Balancing Tests**

We have carried out balancing tests for all the data processing we carry out based on our legitimate interests, which we have described above. You can obtain information on any of our balancing tests by contacting us.

#### **Withdrawing consent or otherwise objecting to direct marketing**

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

- If you would like to unsubscribe from receiving communications which Munnyfinds sends you, you can do so by clicking the “unsubscribe” button at the bottom of email communications which we send you or alternatively by contacting us at [info@munnyfinds.com](mailto:info@munnyfinds.com), In the case of email marketing please allow 48 business hours for your email address to be removed from our system.
- If you would like to unsubscribe from receiving communications which are sent by Partners and other third parties, please contact the Partner or third party directly. In the case of our Partners, if you need our assistance with this, we will be happy to do what we can to help you.
- If you would like to no longer receive push notifications via the App, you can do so by revoking push notification permission for the Apps in your phone’s operating system settings.

Please note that where you have opted out of receiving our email marketing communications via the methods described above, you may still see our non-targeted adverts whilst you are online, if your interests’ settings on Facebook are aligned to an audience segment (pre-defined by Facebook) which our business is also associated with. We do not control whether these ads are displayed to you.

### **Sharing personal information with third parties**

We treat the security and method of processing your Personal Information very seriously, and we will never sell your Personal Information under any circumstances.

However, we may disclose your Personal Information to selected third parties, like our Business Partners.

- If you place an order or otherwise engage with Munnyfinds through a website or app powered on behalf of a third party, then your contact details and details of your order will be passed on to the relevant third party when you make a booking. If you give a third party the relevant consents, they may also send you marketing communications.
- To third party service providers that perform functions on our behalf in relation to the Platform or otherwise in connection with the running of our business, recruiting candidates and for the provision of Munnyfinds’ s services (for example, processing credit card payments (please see paragraphs on Flutterwave below for more information on this), website hosting, conducting surveys and market research, providing social media analysis, providing marketing email services, data analysis tools and to manage customer services communications including telephone calls).

- To our Partners with whom you book services whether via our website or Apps, where we act as commercial booking agent, or directly with the Business Partner via our Business Partner Platform, where we act solely as a technology provider. Your information is shared with Partners in order that:

- bookings can be facilitated and, if necessary, contact made in advance of your appointment.

- if you have opted in to receiving marketing emails from Partners with which you book, these emails can be sent to you containing news and special offers; and

- they can improve the services they offer to their customers and business operations by providing statistical data regarding customers, both on an aggregated basis and on an individual level.

- To third party brands with which we collaborate on products, services, competitions, and campaigns
- To third party salon software providers used by our Partners to ensure that those third-party software solutions and connect each display real-time availability to customers
- To Media agencies and advertising partners in order to run targeted marketing campaigns (please see the Cookies section of this Privacy Policy for further information on online advertising practices)
- To other third parties, for the purpose of facilitating our business and improving our products, content, services, or advertising including, by way of example only, sending email communications or publishing reviews of our or our Partners' products and services
- If we buy, sell, or transfer any business or assets or if we go into insolvency, bankruptcy, or receivership. If this should happen, we may need to disclose your Personal Information to the seller or buyer of such business or assets, as appropriate
- If we are under a duty to disclose or share your Personal Data to comply with any legal obligation or in order to enforce or apply our terms and conditions and other agreements or protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction
- To government authorities, and to other third parties as required or permitted by law, including but not limited to in response to court orders. We also may disclose user information when we have reason to believe that someone is causing injury to or interference with our rights or property, other users of our Platform, or anyone else that could be harmed by such activities.

Please note: by posting any Personal Information in any publicly accessible area of our Platform (such as review sections), such information may be collected by third parties over which we have no control. We are not responsible for the use of such information by such third parties.

Please therefore exercise all due care and consideration before disclosing any Personal Information that will be disclosed on public areas. You should also avoid disclosing on public areas any Personal Information that may be used to identify you (such as your name, age, home or work address or name of your employer).

### **Flutterwave Transactions**

Please note that all Flutterwave transactions are subject to the Flutterwave Privacy Policy which can be found here: <https://flutterwave.com/ng/privacy-policy>. Please ensure that you are happy with the terms of the Flutterwave Privacy Policy if you wish to use Flutterwave to complete any transactions through the Platform.

### **Your rights in relation to your personal information**

In relation to the personal information, we hold about you, you may be entitled to ask us:

- For a copy of your personal information
- -To correct, erase or restrict the processing of your personal information
- -To obtain personal data which you provide to us for a contract or with your consent in a structured, machine-readable format and to ask us to transfer this information to another organization
- -To object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

In the first instance you may be able to view or change the information you have provided us with by logging in to your online account.

Your rights in relation to your personal information are limited in some situations. For example, if fulfilling your request would reveal personal data about another person or if we have a legal requirement or a compelling legitimate ground, we may continue to process Personal Information which you have asked us to delete.

You also may have the right to make a complaint if you feel your personal information has been mishandled. We encourage you to come to us in the first instance but, to the extent that this right applies to you, you are entitled to complain directly to the relevant supervisory authority.

If you wish to exercise any of the above rights, please contact us at [info@munnyfinds.com](mailto:info@munnyfinds.com) Please note, however, that no financial information will be provided without verification.

### **What about other websites linked to our Platform?**

We are not responsible for the practices employed by websites linked to or from our Platform nor the information or content contained therein. Often links to other websites are provided solely as pointers to information on topics that may be useful to the users of our Platform.

Please remember that when you use a link to go from our Platform to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including websites which have a link on our Platform, is subject to that website's own rules and policies. Always read over those rules and policies before proceeding.

### **Social Media and User Generated Content**

Some of our Platforms allow users to submit their own content. Please remember that any content submitted to one of our Platforms can be viewed by the public, and you should be cautious about providing certain personal information e.g., financial information or address details via these Platforms. We are not responsible for any actions taken by other individuals if you post personal information on one of our social media platforms, e.g., Facebook or Instagram. Please also refer to the respective privacy & cookie policies of the social media platforms you are using.

### **Changes to our Privacy Policy**

If we change our privacy policies and procedures, we will post those changes on our Platform to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it.

### **Retention**

We retain your Personal Information for as long as is required to fulfil the activities set out in this Privacy Policy, otherwise communicated to you or for as long as is permitted by applicable law. For example:

- Where you apply for a position at Munnyfinds, whether directly or indirectly, information which you provide will be held for a period of 12 months and may be referred to should you make future applications to work at Munnyfinds, unless you opt to delete this data which you may do so by following the link in the confirmation of application email that we sent you;
- Where you contact us via telephone and do not opt-out, we shall retain call recordings for up 90 days from the date of the call.

### **Our policy on Cookies**

In common with other commercial websites and apps, our Platform use standard technologies including cookies and similar tools including web server logs, web beacons, tokens, pixel tags, local storage, device identifiers and tracking IDs (together referred to as “Cookies” in this Privacy Policy) to enhance your user experience, improve our site and provide tailored offers on Munnyfinds and other sites.

The third-party companies that we use for targeting and advertising purposes have their own privacy policies which you should read in detail.