**PRIVACY POLICY**

Last updated April 29, 2025

This Privacy Notice for Roam ('we', 'us', or 'our'), describes how and why we access, collect, store, use, and share ('process') your personal information when you use our services ('Services'), including when you:

* Download and use our mobile application (Roam), or any other application of ours that links to this Privacy Notice.
* Use Roam. Roam is a ride-booking application designed for both riders and drivers. Riders use Roam to quickly find and book rides to their destinations with real-time tracking and fare estimates. Drivers use the app to receive ride requests, navigate to pick-up points, and transport passengers efficiently. With a user-friendly interface and smart matching system, Roam aims to ensure fast, safe, and reliable transportation.
* Engage with us in other related ways, including any sales, marketing, or events.

This Privacy Notice is provided on behalf of the Government of Fiji.

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at: leeshaprasad2555@gmail.com.

**SUMMARY OF KEY POINTS**

This summary provides key points from our Privacy Notice, and you can find more details about any of these topics by clicking the link following each key point or by using our table of contents below.

* **What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use. Learn more about [personal information you disclose to us](#what-information-do-we-collect).
* **Do we process any sensitive personal information?** Some information may be considered 'special' or 'sensitive' in certain jurisdictions, for example, your racial or ethnic origins, sexual orientation, and religious beliefs. We do not process sensitive personal information.
* **Do we collect any information from third parties?** We may share data with third parties to provide our services. Learn more about [third-party services](#third-party-services).
* **How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with the law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Learn more about [how we process your information](#how-do-we-process-your-information).
* **In what situations and with which parties do we share personal information?** We may share information in specific situations and with specific third parties. Learn more about [when and with whom we share your personal information](#when-and-with-whom-do-we-share-your-per).
* **How do we keep your information safe?** We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about [how we keep your information safe](#how-do-we-keep-your-information-safe).
* **What are your rights?** Depending on your location, the applicable law may mean you have certain rights regarding your personal information. Learn more about [your privacy rights](#what-are-your-privacy-rights).
* **How do you exercise your rights?** The easiest way to exercise your rights is by submitting a data subject access request, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.
* **Want to learn more about what we do with any information we collect?** Review the Privacy Notice in full.

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**1. WHAT INFORMATION DO WE COLLECT?**

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**Personal information you disclose to us**

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

* names
* phone numbers
* email addresses
* usernames
* passwords
* car number plate

Sensitive Information. We do not process sensitive information.

Application Data. If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

* Mobile Device Data. We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device’s operating system or platform, the type of mobile device you use, your mobile device’s unique device ID, and information about the features of our application(s) you accessed.
* Push Notifications. We may request to send you push notifications regarding your account or certain features of the application(s). If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

**Information automatically collected**

In Short: Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

The information we collect includes:

* Device Data. We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
* Location Data. We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

**2. HOW DO WE PROCESS YOUR INFORMATION?**

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In Short: We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

* To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.
* To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.
* To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
* To send administrative information to you. We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.
* To fulfil and manage your orders. We may process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.
* To enable user-to-user communications. We may process your information if you choose to use any of our offerings that allow for communication with another user.
* To protect our Services. We may process your information as part of our efforts to keep our Services safe and secure, including fraud monitoring and prevention.
* To identify usage trends. We may process information about how you use our Services to better understand how they are being used so we can improve them.
* To verify user identity. We collect phone numbers to verify user identity and facilitate communication between riders and drivers.
* To ensure driver and vehicle verification. We collect car number plates to ensure driver and vehicle verification for safety and security.

**3. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

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In Short: We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in the following situations:

* Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
* Other Users. When you share personal information or otherwise interact with public areas of the Services, such personal information may be viewed by all users and may be publicly made available outside the Services in perpetuity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Services, and view your profile.

**4. THIRD-PARTY SERVICES**

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We may share your data with the following third-party service providers for the purposes outlined below:

* **Analytics providers:** To track and analyze app usage and trends, allowing us to improve the Services.
* **Mapping services:** To provide location-based services, such as displaying rider and driver locations and optimizing routes.
* **Payment processors:** To securely process payments for ride bookings.
* **Cloud hosting providers:** To store and maintain the data and infrastructure necessary to provide the Services.
* **Communication services:** To facilitate communication between riders and drivers.
* **Advertising and marketing partners:** To deliver targeted advertising and promotional materials, where permitted by law and with your consent.

We ensure that these third-party service providers process your information in accordance with applicable data protection laws and our privacy policy.

**5. HOW LONG DO WE KEEP YOUR INFORMATION?**

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In Short: We keep your information for as long as necessary to fulfil the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). Unless otherwise required by law, we will adhere to the following data retention schedule:

* User account information will be retained as long as the account is active. After an account is deleted, we will retain certain information (including name, email address, and transaction history) for 180 days for fraud prevention, dispute resolution, and legal compliance purposes.
* Device and location data will be retained for 90 days for analytics and service improvement.
* Communication logs between riders and drivers will be retained for 30 days for customer support and dispute resolution.
* Car number plate information will be retained for 7 days for safety and security purposes.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

**6. HOW DO WE KEEP YOUR INFORMATION SAFE?**

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In Short: We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

**7. DO WE COLLECT INFORMATION FROM MINORS?**

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In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly collect, solicit data from, or market to children under 18 years of age, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent’s use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at leeshaprasad2555@gmail.com.

**8. WHAT ARE YOUR PRIVACY RIGHTS?**

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In Short: You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.

You have the following rights regarding your personal data:

* **Right to Access:** You have the right to request a copy of the personal data we hold about you.
* **Right to Rectification:** You can request that we correct any inaccurate or incomplete personal data.
* **Right to Erasure ("Right to be Forgotten"):** You can request that we delete your personal data under certain circumstances, such as when the data is no longer necessary for the purpose for which it was collected.
* **Right to Restriction of Processing:** You can request that we limit the processing of your personal data under certain circumstances.
* **Right to Data Portability:** You can request to receive your personal data in a structured, commonly used, and machine-readable format and have the right to transmit that data to another controller.
* **Right to Object:** You have the right to object to the processing of your personal data under certain circumstances.
* **Right to Withdraw Consent:** If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can:

* Contact us using the contact information provided.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

If you have questions or comments about your privacy rights, you may email us at leeshaprasad2555@gmail.com.

**9. CONTROLS FOR DO-NOT-TRACK FEATURES**

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Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice.

**10. INTERNATIONAL DATA TRANSFERS**

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Your personal information may be transferred to and processed in countries other than Fiji. These countries may have data protection laws that are different from the laws of Fiji. We have taken safeguards to ensure that your personal information remains protected. These safeguards include implementing Standard Contractual Clauses approved by the European Commission, and ensuring that any third-party service providers we use have appropriate data protection measures in place.

**11. LEGAL BASIS FOR PROCESSING**

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We process your personal information based on the following legal bases:

* **Consent:** We process your information when you have given us your explicit consent to do so for specific purposes.
* **Contractual Necessity:** We process your information as necessary to perform our contract with you, such as providing the ride-booking service.
* **Legal Obligation:** We process your information as necessary to comply with legal obligations, such as responding to lawful requests from government authorities.
* **Legitimate Interests:** We process your information for our legitimate business interests, such as improving our Services, preventing fraud, and ensuring network and information security, as long as those interests do not outweigh your rights and freedoms.

**12. DO WE MAKE UPDATES TO THIS NOTICE?**

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In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated 'Revised' date at the top of this Privacy Notice. If we make material changes to this Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

**13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?**

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If you have questions or comments about this notice, you may email us at leeshaprasad2555@gmail.com or contact us by post at:

Roam

Lot 6, Navuso road

Nausori

Nausori, Suva 00000

Fiji

**14. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

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You have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please fill out and submit a data subject access request.