#### **BPRENTS PRIVACY POLICY**

This Privacy Policy explains what personal data is collected when you use the bprents.ng any bprents.ng mobile application, or website ("Bprents", "Website", or "App") and the services provided through it (together with the Website and the App, the "Service"), how such personal data will be used, shared.

BY USING THE SERVICE, YOU PROMISE US THAT (I) YOU HAVE READ, UNDERSTOOD AND AGREE TO THIS PRIVACY POLICY, AND (II) YOU ARE OVER 16 YEARS OF AGE (OR HAVE HAD YOUR PARENTS OR GUARDIAN READ AND AGREE TO THIS PRIVACY POLICY FOR YOU).

If you do not agree or are unable to make this promise, you must not use the Service. In such case, you must contact the support team via online chat or email to (a) request deletion of your account and data. "**Process**", in respect of personal data, includes to collect, store, and disclose to others.

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#### 1. PERSONAL DATA CONTROLLER

ENTERTAINMENT SOUND EMPIRE LIMITED, a body corporate duly incorporated under the Companies and Allied Matters Act, CAP C20 LFN 2004 with RC 1611454 and its registered office address at NO. 6A, ROAD 2 OKANIA NEW LAYOUT, RUMUOKWUTA, PORT HARCOURT will be the controller of your personal data

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### 2. CATEGORIES OF PERSONAL DATA

2.1 We collect data you give us voluntarily (for example, an email address). We also collect data automatically (for example, your IP address).

## 2.2 Data you give us.

You may be asked to provide us information about yourself when you register for and/or use the Service. This information includes: first name, phone number, email (together "Required Information"), last name, photo, address details, working hours.

To use our Service and register an account, you will need to provide Required Information. You will be able to use the Service even if you do not give this data to us, but some Service's functionality may be limited to you (for example, if you do not register an account, you will not be able to chat with other users, post ads, see contact details of other users). Sometimes you may also need to provide to us additional information in the communication with our Support Team in order to fulfil your request (for example, if your account was

previously blocked, we may ask you to confirm your identity by providing an ID document).

By providing information about yourself within the registration process, you agree and understand that this data will be publicly available (including, for example, phone number). Please do not provide personal data to your profile that you would not want to be publicly available. Users are responsible for all the information posted by them in public accounts. You should carefully consider all the risks associated with the fact that you make certain information — in particular, phone number, the address, or information about the place of your exact location — publicly available.

## 2.3 Announcements and Transactions

As part of the activities of the website, we may post information, including personal and contact information, necessary for transactions between the buyer and seller, for sending messages and communication between users among themselves and making payments. You acknowledge that information contained in your profile and provided when submitting ads will be made publicly available to other users of the Service Please do not provide personal data to your profile or in the ads that you would not want to be publicly available. You should carefully consider all the risks associated with the fact that you make certain information — in particular, phone number, the address or information about the place of your exact location — publicly available.

## 2.4 Data provided to us by third parties

When you decide to log in using Facebook or Google, we get personal data from your Facebook or Google account. This includes your profile image, name, email, Facebook ID, Google ID, friends list. For more information, please refer to the Facebook Permissions Reference (describes the categories of information, which Facebook

may share with third parties and the set of requirements) and to the Facebook Data Policy. In addition, Facebook and Google let you control the choices you made when connecting your Facebook profile to the Website. To know more about how Google processes your data, visit its privacy policy. The information obtained from third parties will be processed for the purposes described in and in accordance with this Privacy Policy.

## 2.6 Data we collect automatically:

## 1. Data about how you found us

We collect data about your referring URL (that is, the place on the Web where you were when you tapped on our ad).

#### 2. Device and Location Data.

We collect data from your device. Examples of such data include language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID, and Facebook ID.

## 3. Usage data

We record how you interact with our Service. For example, we log the features, and content you interact with, how often you use the Service, how long you are on the Service, what sections you use, how many ads you watch.

## 4. Advertising IDs

We collect your Apple Identifier for Advertising ("IDFA") or Google Advertising ID ("AAID") (depending on the operating system of your device). You can typically reset these numbers through the settings of your device's operating system (but we do not control this).

### 5. Transaction data

When you make payments through the Service, you need to provide financial account data, such as your credit card number, to our thirdparty service providers. We do not collect or store full credit card number data, though we may receive credit card-related data, data about the transaction, including date, time and amount of the transaction, the type of payment method used.

#### 6. Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. Cookies can be either session cookies or persistent cookies. A session cookie expires when you close your browser and is used to make it easier for you to navigate our Service. A persistent cookie remains on your hard drive for an extended period of time. We also use tracking pixels that set cookies to assist with delivering online advertising. Cookies are used, in particular, to automatically recognize you the next time you visit our Website. As a result, the information, which you have earlier entered in certain fields on the Website may automatically appear the next time when you use our Service. Cookie data will be stored on your device and most of the times only for a limited time period.

## 3. DATA PROTECTION PRINCIPLES

In our data protection practices we strive in particular, to provide that personal data is:

- 1. processed in accordance with specific, legitimate and lawful purpose consented to by you;
- 2. is adequate, accurate and without prejudice to the dignity of a human person;
- 3. stored only for the period within which it is reasonably needed; and
- 4. secured against reasonably foreseeable hazards and breaches such as theft, cyberattack, viral attack, dissemination, manipulations of any kind, damage by rain, fire or exposure to other natural elements.

## 4. PROCESSING PERSONAL DATA

We process your personal data:

- 1. To provide our Service

  This includes enabling you to use the Service in a seamless manner and preventing or addressing Service errors or technical issues.
- 2. To customize your experience
  We process your personal data to adjust the content of the Service
  and make offers tailored to your personal preferences and interests.
- 3. To manage your account and provide you with customer support We process your personal data to respond to your requests for technical support, Service information or to any other communication you initiate. This includes accessing your account to address technical support requests. For this purpose, we may send you, for instance, notifications or emails about the performance of our Service, security, payment transactions, notices regarding our Terms and Conditions of Use or this Privacy Policy.
- 4. To communicate with you regarding your use of our Service We communicate with you, for example, by push notifications or in the chat. As a result, you may, for example, receive a notification whether on the Website or via email that you received a new message on bprents. To opt out of receiving push notifications, you need to change the settings on your browser or mobile device. To opt out of the certain type of emails, you need to follow an unsubscribe link located in the footer of the email by contacting our support team or in your profile setting.
  - The services that we use for these purposes may collect data concerning the date and time when the message was viewed by our users, as well as when they interacted with it, such as by clicking on links included in the message.
- 5. To research and analyze your use of the Service

This helps us to better understand our business, analyze our operations, maintain, improve, innovate, plan, design, and develop brents and our new products. We also use such data for statistical analysis purposes, to test and improve our offers. This enables us to better understand what features and sections of brents our users like more, what categories of users use our Service. As a consequence, we often decide how to improve brents based on the results obtained from this processing. For example, if we discover that Jobs section is not as popular as others, we may focus on improving it.

## 6. To send you marketing communications

We process your personal data for our marketing campaigns. We may add your email address to our marketing list. As a result, you will receive information about our products, such as for example, special offers, and products of our partners. If you do not want to receive marketing emails from us, you can unsubscribe following instructions in the footer of the marketing emails, by contacting our support team or in your profile setting.

We may also show you advertisements on the Website, and send you push notifications for marketing purposes. To opt out of receiving push notifications, you need to change the settings on your device or/and browser.

## 7. To personalize our ads

We and our partners use your personal data to tailor ads and possibly even show them to you at the relevant time. For example, if you have visited our Website, you might see ads of our products, for example, in your Facebook's feed.

We may target advertising to you through a variety of ad networks and exchanges, using data from advertising technologies on and off of our Services like unique cookie, or similar tracking technology, pixel, device identifiers, geolocation, operation system information, email.

# How to opt out or influence personalized advertising iOS:

On your iPhone or iPad, go to "Settings," then "Privacy" and tap "Advertising" to select "Limit Ad Track". In addition, you can reset your advertising identifier (this also may help you to see less of personalized ads) in the same section.

#### Android:

To opt-out of ads on an Android device, simply open the Google Settings app on your mobile phone, tap "Ads" and enable "Opt out of interest-based ads". In addition, you can reset your advertising identifier in the same section (this also may help you to see less of personalized ads).

To learn even more about how to affect advertising choices on various devices, please look at the information available here. In addition, you may get useful information and opt out of some interest-based advertising, by visiting the following links:

- 1. Network Advertising Initiative https://optout.networkadvertising.org/
- 2. Digital Advertising Alliance https://optout.aboutads.info/
- 3. Digital Advertising Alliance (Canada) https://youradchoices.ca/choices
- 4. Digital Advertising Alliance (EU) https://www.youronlinechoices.com/
- 5. DAA AppChoices page https://www.aboutads.info/appchoices Browsers:

It is also may be possible to stop your browser from accepting cookies altogether by changing your browser's cookie settings. You can usually find these settings in the "options" or "preferences" menu of your browser. The following links may be helpful, or you can use the "Help" option in your browser.

- 6. Cookie settings in Internet Explorer
- 7. Cookie settings in Firefox
- 8. Cookie settings in Chrome
- 9. Cookie settings in Safari web and iOS

Google allows its users to opt out of Google's personalized ads and to prevent their data from being used by Google Analytics.

**Facebook** also allows its users to influence the types of ads they see on Facebook. To find how to control the ads you see on Facebook, please go here or adjust your ads settings on Facebook

10. To enforce our Terms and Conditions of Use and to prevent and combat fraud

We use personal data to enforce our agreements and contractual commitments, to detect, prevent, and combat fraud. As a result of such processing, we may share your information with others, including law enforcement agencies (in particular, if a dispute arises in connection with our Terms and Conditions of Use).

## 11.To comply with legal obligations

We may process, use, or share your data when the law requires it, in particular, if a law enforcement agency requests your data by available legal means.

## 12. To process your payments

We provide paid products and/or services within the Service. For this purpose, we use third-party services for payment processing (for example, payment processors). As a result of this processing, you will be able to make a payment and use the paid features of the Service.

### 5. LOCUS STANDI FOR PROCESSING PERSONAL DATA

We process your personal data, in particular, under the following legal bases:

- 1. your consent;
- 2. to perform our contract with you;
- 3. for our (or others') legitimate interests; Under this legal basis we, in particular:
  - communicate with you regarding your use of our Service This includes, for example, sending you push notifications reminding you that you have unread messages. The legitimate interest we rely on for this purpose is our interest to encourage you to use our Service more often. We also take into account the potential benefits to you.
  - or research and analyze your use of the Service

    Our legitimate interest for this purpose is our interest in improving our Service so that we understand users' preferences and are able to provide you with a better experience (for example, to make the use of our mobile application easier and more enjoyable, or to introduce and test new features).
  - send you marketing communications
     The legitimate interest we rely on for this processing is our interest to promote our Service in a measured and appropriate way.
  - personalize our ads
     The legitimate interest we rely on for this processing is our interest to promote our Service in a reasonably targeted way.
  - enforce our Terms and Conditions of Use and to prevent and combat fraud
    - Our legitimate interests for this purpose are enforcing our legal rights, preventing and addressing fraud and unauthorized use of the Service, non-compliance with our Terms and Conditions of Use.
  - to comply with legal obligations.

### 6. PERSONAL DATA SHARING

We share information with third parties that help us operate, provide, improve, integrate, customize, support, and market our Service. We may share some sets of personal data, in particular, for purposes and with parties indicated in Section 2 of this Privacy Policy. The types of third parties we share information with include, in particular:

## 1. Service providers

We share personal data with third parties that we hire to provide services or perform business functions on our behalf, based on our instructions. We may share your personal information with the following types of service providers:

- cloud storage providers (Amazon, DigitalOcean, Hetzner)
- o data analytics providers (Facebook, Google, Appsflyer)
- marketing partners (in particular, social media networks, marketing agencies, email delivery services; such as Facebook, Google, Mailfire)
- 2. Law enforcement agencies and other public authorities We may use and disclose personal data to enforce our Terms and Conditions of Use, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, or in other cases provided for by law.
- 3. Third parties as part of a merger or acquisition
  As we develop our business, we may buy or sell assets or business offerings. Customers' information is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g. parent company or subsidiary) and may transfer such information in the course of a corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

#### 7. EXERCISE OF PRIVACY RIGHTS

To be in control of your personal data, you have the following rights: Accessing / reviewing / updating / correcting your personal data. You may review, edit, or change the personal data that you had previously provided to Bprents in the settings section on the Website. You may also request a copy of your personal data collected during your use of the Service.

**Deleting your personal data.** You can request the erasure of your personal data by sending us an email.

When you request deletion of your personal data, we will use reasonable efforts to honour your request. In some cases we may be legally required to keep some of the data for a certain time; in such event, we will fulfil your request after we have complied with our obligations.

Objecting to or restricting the use of your personal data (including for direct marketing purposes). You can ask us to stop using all or some of your personal data or limit our use thereof by sending a request.

The right to lodge a complaint with the supervisory authority. We would love you to contact us directly, so we could address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority.

### 8. AGE LIMITATION

We do not knowingly process personal data from persons under 16 years of age. If you learn that anyone younger than 16 has provided us with personal data, please contact us.

# 9. AMENDMENT AND MODIFICATION OF PRIVACY POLICY

We may amend or modify this Privacy Policy from time to time. If we decide to make material changes to this Privacy Policy, you will be notified through our Service or by other available means and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.

#### 10. DATA RETENTION

We will store your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy (including providing the Service to you), which includes (but is not limited to) the period during which you have a Bprents account. We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### 11. CONTACT US

You may contact us at any time for details regarding this Privacy Policy and its previous versions. For any questions concerning your account or your personal data please contact us at bprents.ng.

**EFFECTIVE AS OF SEPTEMBER 2020** 

### **BPRENTS POSTING TERMS & CONDITIONS**

# Following rules are required while you are posting adverts on Bprents:

- 1. Every advert must have a precise title.
- 2. Every advert should contain only unique images (taken by the seller and not downloaded from the Internet) without any contact information or watermarks.
- 3. Every advert must contain images.
- 4. Make sure you chose an appropriate category.
- 5. The prices of your items must correspond to the real prices of similar products.
- 6. All posted products and/or services must be located in Nigeria.
- 7. All items and products must be legally permitted.
- 8. Each item for sale must be posted separately. You cannot post several products within one and the same advert.
- 9. Every advert must contain a brief and clear description.

## If you really want to create a great ad, it is highly recommended to follow the instructions below:

- 1. Use a clear title which includes the name of the item you rent. Try to make your title appealing and eye-catching.
- 2. Set an appropriate price for your item so that the advert is approved. If the price is not relevant, it may be declined. Make sure to carry out some investigation of the prices for a particular item.
- 3. The description of your product must be informative enough and mustn't contain any false information regarding your product or service.
- 4. Upload only unique and high-quality photos of your items taken by yourself and not downloaded from the Internet. The better photos you add, the more attractive your ad looks to the potential clients and the more calls you receive.

- 5. Indicate correct contact details for the potential clients to be able to reach you easily. Try to respond all the incoming calls or to call back your customers once available.
- 6. Try to fill out all the fields of your profile page, as well as those of your advert, to let your customers dispose of all the necessary information about you as a vendor and the products you rent.
- 7. The better rating you have on our website, the more chances you get to attract a lot of customers. Remember that it is important to build trust in your business. Your rating depends on the number of positive/negative feedback received from your previous customers.
- 8. Make your advert as risk-free as possible. Underline that no prepayments are required and be ready to list those delivery services which presuppose payment on the delivery of the product ordered.

# There are several reasons why your ad can be placed declined by our moderators:

- 1. 1. You tried to post several items within one ad. It is not allowed to do that. Each item for rental must be posted separately, one ad one product. Please follow this simple rule so that your ad is activated shortly.
- 1. 2. Pictures you've uploaded contain contact numbers. We do not allow posting this kind of photos. Please add pics which don't have any phone numbers for your ads to go active on byrents.
- 1. 3. There are certain restrictions concerning prices users might set. Please, input an appropriate price for your advert to be approved. If the price is not relevant, it may be declined. Make sure to carry out some investigation of a market value of an item you intend to rent.

# To post your ads on bprents fast, just take the following steps to proceed:

Notes: if you are not a registered user, the first step will be registration.

- 1. Click on the button "Rent";
- 2. Complete all the information (add at least 3 photos for cars and phones);
- 3. Choose a proper category, upload your photos and write a clear title with a full description of your item. After that, enter a fair price, select attributes and send your advert to review!

After filling out the required fields, click on "Post Ad" button; When you've done all of these steps, our moderators will check your advert.

Once your advert is live, you will receive a notification email.

If there's something wrong, we'll specify all the mistakes you should edit.

## In event of challenges with regards to posting ads, we recommend:

- 1. Wait for a while before your ad passes the moderation. It's quite possible that our moderators are checking your advert and it will appear in search results within a few hours.
- 2. Check your inbox. There you will get a notification when your advert goes live. Also, if there is something wrong with your advert, we'll specify all the mistakes you should edit.

Important! If you make some changes in your advert, it must pass the moderation one more time. Temporarily we won't show it in search results.

You can always manage your ads, just sign in to your Bprents account and click on My Adverts.

Users shall comply with all applicable laws, the Terms and Conditions of Use and all posted Platform rules and policies.

Here is a non-exhaustive list of goods and services promotion of which is prohibited on Bprents in Nigeria:

- 1. Narcotics, steroids, and any drugs or medications that require a prescription from a licensed medical specialist
- 2. Weapons
- 3. Restricted military/police items
- 4. Human organs
- 5. Illegal/pirated copies
- 6. Stolen property
- 7. Code grabbing and lock picking devices
- 8. Electronic equipment prohibited by the law
- 9. Sexually-oriented services
- 10. Loans, money transactions, Bitcoin
- 11. Multi-level marketing, pyramid, and matrix programs
- 12. Network marketing and "Home Base Business" jobs
- 13. Products (goods or services) prohibited to rent by the law, in particular:
- Medical devices, drugs, drug products, cosmetics, chemicals, agrochemicals, pesticides, veterinary drugs or other goods if they have not been registered with the National Agency for Food & Drug Administration and Control (the "NAFDAC") or other relevant authority of Nigeria;
- Any goods, sale, rental, distribution or advertising of which is banned or restricted by the NAFDAC or any other relevant authority of Nigeria;
- Any goods, sale, rental, distribution or advertising of which is prohibited by applicable legislation of Nigeria;
- Any goods that do not comply with standards and quality requirements imposed on such goods by applicable legislation of Nigeria;
- Any goods that are represented on the label or described as a treatment, preventative or cure for diseases, disorders or abnormal physical states specified by applicable legislation of Nigeria.

If you have noticed any announcements promoting Prohibited Items on Bprents, please report them via the "Report Abuse" link available in each posting

### **DURATION OF POSTS**

Your ads remain on the site for 1-3 months (since the date of the last update) before they are automatically deleted or until you decide to deactivate them. Please note that you can update your ad if you haven't rented your item.