

1. KOWRI PRIVACY POLICY

- 1.1. At Sevn (Ghana), we are keenly aware of the trust our users place in us, and our responsibility to protect their privacy. We believe transparency and choice are the foundations of privacy. We strive to let users know what information we collect when they use our products and services and give users meaningful choices about what information they provide to KOWRI and to others.
- 1.2. The KOWRI Privacy Policy describes how we treat personal information when you use KOWRI's products and services. In addition, the following describes our privacy practices that are specific to KOWRI. You accepted this policy when you signed up for our Service. We may amend this policy at any time by posting a revised version on our website and sending you a copy via email.

2. INFORMATION WE COLLECT AND HOW WE USE IT

- 2.1. Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient, and customised experience. We may use your personal information to:
 - 2.1.1. provide the services and customer support you request;
 - 2.1.2. process transactions and send notices about your transactions
 - 2.1.3. resolve disputes, collect fees, and troubleshoot problems;
 - 2.1.4. prevent potentially prohibited or illegal activities, and enforce our Terms of Service;
 - 2.1.5. customise, measure, and improve our services and the content and layout of our website;
 - 2.1.6. send you targeted marketing, service update notices, and promotional offers based on your communication preferences;
 - 2.1.7. compare information for accuracy and verify it with third parties.

3. REGISTRATION INFORMATION

- 3.1. When you sign up for a KOWRI Account, we ask for your personal information so that we can provide you with the service. The information we require to register for the service includes your name, other names, gender, birthday, mobile number, address, citizenship, and email

address.

- 3.2. For businesses or non-profit organisations, we also require you to provide your website address, email, business category, business name, business type, industry, phone number, location address, and a government-issued identification number (TIN or VAT for Ghana-based businesses). This information allows us to process payments and protect users from fraud. In some cases, we may also ask you to send us additional information or to answer additional questions to help verify your information. The information we collect is stored in association with your KOWRI Account.

4. INFORMATION OBTAINED FROM THIRD PARTIES

- 4.1. In order to protect you from fraud or other misconduct, we may obtain information about you from third parties to verify the information you provide. For example, we may use bank authorization and fraud screening services to verify that your business location address matches the information that you provided to us.

5. TRANSACTION INFORMATION

- 5.1. When you use KOWRI to conduct a transaction, we collect information about each transaction, including but not limited to the transaction amount, a description provided by the seller of the goods or services being purchased, and the names of the seller and buyer.

6. INFORMATION ABOUT YOUR USE OF THE SERVICE

- 6.1. In order to protect you from fraud, phishing, and other misconduct, we may collect information about your interaction with the service to help validate your identity or detect potentially fraudulent conduct. For example, in some circumstances, we may try to determine service usage patterns (such as how quickly you type) so that we can try to detect and prevent unauthorized attempts to access your account (such as automated hacking attacks, or the use of stolen usernames or passwords). Any such information we collect will only be used to detect and prevent fraud or other misconduct unless you explicitly grant us permission to use it in another manner.

7. KOWRI COOKIES

- 7.1. When you access your KOWRI Account or a payLIVE webpage, we send one or more cookies - a small file containing a string of characters - to your computer that uniquely identifies your browser. We use cookies to improve the quality of our service by storing user preferences and tracking user trends.
- 7.2. We send a "session cookie" to your computer when you log in to your account. This type of cookie helps us to recognize you if you visit multiple pages on our site during the same session so that we don't need to ask you for your password on each page. Once you log out or close your browser, this cookie expires and no longer has any effect.
- 7.3. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. We encode our cookies so that only we can interpret the information stored in them. You are free to decline our cookies if your browser permits, but doing so may interfere with your use of our website.

8. LOG INFORMATION

- 8.1. When you access KOWRI Webpages, our servers automatically record information that your browser sends to us. These server logs may include information such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.

9. USER COMMUNICATIONS

- 9.1. When you send an email or other communication to us, we may retain those communications in order to process your inquiries, respond to your requests and improve our services.

10. LINKS

- 10.1. We may present links in a format that enables us to keep track of whether these links have been followed. We use this information to improve the quality of our search technology and customized content.
- 10.2. In addition to the above, we use the information we collect to:
 - 10.2.1. Provide our products and services to you, including the display of customized content;
 - 10.2.2. Perform auditing, research and analysis in order to maintain, protect and improve our services;
 - 10.2.3. Ensure the technical functioning of our platform; and

10.2.4. Develop new services.

10.3. We process personal information on our servers in Ghana and the United States of America. We may process personal information to provide our own services.

11. INFORMATION SHARING

11.1. We will not sell or rent your personal information to companies or individuals outside of Sevn (Ghana). If you are making a purchase with KOWRI, we will not share any of the personal information you provided us during the registration of your account; except in the limited circumstances described below. In addition, we will only share your personal information with other companies or individuals outside of Sevn (Ghana) in the following circumstances:

11.2. As necessary to process your KOWRI & banking transactions and maintain your account. As with any financial institution, if you process a transaction through our service, we need to share some information (for example, your business and account number) with our partner banks and the Bank of Ghana. Some sellers may require that their buyers provide contact information (for example, a telephone number) in order to process a transaction. In those cases, the merchant will specifically request that information from you from their website before or after your KOWRI transaction. We will not share your telephone number with the merchant, and where necessary, we will inform and request your permission online before you complete your transaction.

11.3. As a standard policy to protect our users, KOWRI does not allow or approve merchants who request users' KOWRI details on their website. Any such merchant has not been certified by KOWRI and users are advised to report immediately and not to transact with the merchant.

11.4. You may be given a choice on a seller-by-seller basis whether you'd like to receive promotional emails from the seller. If you decide later that you don't want to receive promotional emails from a seller, you will need to contact the seller directly.

11.5. To detect, prevent, or otherwise address fraud, security or technical issues.

11.5.1. We have your consent. We require opt-in consent for the sharing of any sensitive personal information.

11.5.2. We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Policy and any other appropriate confidentiality and security measures.

11.5.3. We have a good faith belief that access, use, preservation or disclosure of such

information is reasonably necessary to:

11.5.3.1. Satisfy any applicable law, regulation, legal process or enforceable governmental request,

11.5.3.2. Enforce applicable Terms of Service including investigation of potential violations thereof,

11.5.3.3. Detect, prevent, or otherwise address fraud, security or technical issues, or

11.5.3.4. Protect against imminent harm to the rights, property or safety of Sevn (Ghana), its users or the public as required or permitted by law.

11.5.4. We may share aggregated non-personally identifiable information with third parties. For example, we may disclose that a certain percentage of our users have a billing address in a particular geographic area, or that a certain percentage of users are of a particular gender. However, if we do share this aggregated information, we do not include personally identifiable information without your explicit opt-in consent or in the limited circumstances described above.

11.5.5. If Sevn (Ghana) or its subsidiaries become involved in a merger, acquisition, or any form of sale of some or all of their assets, we will provide notice before personal information is transferred and becomes subject to a different privacy policy.

12. INFORMATION SECURITY

12.1. We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical and technical security measures to guard against unauthorized access to systems where we store personal data. For example, your email address will always be stored in an encrypted form (except when you provide it to us in communication outside of our web page or mobile app interface).

12.2. The security of your account also depends on keeping your account password confidential, and you should not share your account name or password with anyone. If you do share your account information with a third party, they will have access to your account and your personal information.

13. DATA INTEGRITY

13.1. KOWRI processes personal information only for the purposes for which it was collected and in accordance with this Privacy Policy or any applicable service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services or as otherwise permitted under this Policy. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

14. ACCESSING AND UPDATING PERSONAL INFORMATION

14.1. You can review and update your payment information by logging in to your KOWRI Account and going to the "Account Settings" page, where you can update your personal information (for example, change in address or phone number). You can also view all your previous transaction history on the "Money Story" page. You can disable or close your KOWRI account by contacting us. If you do so, your KOWRI account will no longer be able to conduct transactions. However, in order to meet our reporting and auditing obligations, and to detect, deter, and prevent fraud or other misconduct on our systems, your account information will be retained in our systems. If you disable KOWRI, your personally identifiable information will not be used by Sevn (Ghana) or shared with third parties except for these purposes. We may delete these records over time if permitted or required by law.

14.2. Disabling your KOWRI account does not close or cancel your KOWRI Account. This Privacy Policy continues to apply to the personal information we maintain after you disable or close or cancel your KOWRI Account.

15. ENFORCEMENT

15.1. KOWRI regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Privacy Policy or KOWRI's treatment of personal information by contacting us through this website www.kowri.com.gh or by writing to us at

Privacy Matters
C/o Sevn (Ghana) Ltd.
PMB CT 498 Cantonments
Accra, Ghana

15.2. When we receive formal written complaints at this address, it is KOWRI's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between Sevn (Ghana) and an individual, business or non-profit.

16. CHANGES TO THIS POLICY

16.1. Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Policy without your explicit consent. We will email you and post on our Web Pages any Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including a notification in your account interface or SMS notification). Each version of this Policy will be identified at the top of the page by its effective date, and we will also keep prior versions of this Privacy Policy in an archive for your review. If you have any questions about this Policy, please feel free to contact us through our website or write to us at

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