

Privacy Notice

Using your personal data in a fair and transparent way is important to Riel Creations Ltd (“Riel”, “we”, or “us”). When you use our desktop or mobile websites and applications (the “Platform”), we may collect information about you, including information that can be used to identify you (“Personal Information”). Additionally, we may obtain Personal Information about you from third parties as described in this Privacy Notice. We collect this data to provide allow you to place orders and access other functionality on the Platform (the “Services”), as well as for the other purposes described in this Privacy Notice.

This Privacy Notice is intended to help you understand: (A) What Personal Information we collect, how we collect it, how we use it, and how we share it, (B) The choices you have related to your Personal Information, and (C) How we protect your Personal Information.

Please take a moment to review the terms of this Privacy Notice, which is incorporated into the Terms of Service governing your use of the Platform and Services, available for Kenya, Users in the cities we serve and for users in the hoods we serve.

By accessing the Platform or using the Services, you agree that we may collect, process, and share your information (including Personal Information) consistent with this Privacy Notice and to the Terms of Service.

1. Types of Information We Collect

The following information is collected by or on behalf of Riel

A. Account Information

When you register for our Platform or use our Services, we may ask that you provide information that can be used to personally identify you. This may include details such your name, phone number, date of birth, login credentials, delivery address, and certain payment information (i.e., payment M-pesa number), as well as numbers, usernames, or other identifiers that are assigned uniquely to you

B. Other Information

Based on how you interact with the Platform, we may also collect information about your spending habits, preferences, and demographic information.

C. Usage Information

We may collect certain information automatically when you visit the Platform from your browser or by using cookies, as described below. This “Usage Information” may include

- Your browser type and operating system
- Your Internet Protocol (IP) address, which is the number automatically assigned to your computer whenever you access the Internet and that can sometimes be used to derive your general geographic area

Privacy Policy - Riel

- Geolocation information
- Other unique identifiers, including mobile device identification numbers
- Websites you visited before and after visiting the Platform
- Pages you view and links you click on within the Platform
- Information collected through cookies, web beacons, and other technologies
- Information about your interactions with e-mail messages, such as the links clicked on and whether the messages were opened or forwarded
- Standard server log information

We may combine Usage Information with your Personal Information. If we do so, we will treat the combined information as Personal Information under this Privacy Notice

2. How We Collect Information

We may collect information from you in the following ways:

A. From You Directly

We receive Personal Information directly from you when you provide it to us, such as when you register for the Platform or place an order. Additionally, you may be required to provide Personal Information when you contact us for support or with question so that we can respond appropriately.

B. Through Technology

We (or our partners) may use automated means to collect information about you and the device that you use to access the Platform. These automated means include technologies such as cookies, web beacons, and similar technologies (described in more detail below). These technologies help us analyze trends, administer the Services, track your interaction with the Platform, understand your preferences habits, and gather Other Information. They also allow us to provide you with recommendations and content that are tailored to you.

C. Cookies

Our Platform utilizes cookies, web beacons and mobile application software development kits (“SDKs”) (collectively, “Tracking Technologies”) to gather information about you. Cookies are small text files that websites send to your device to uniquely identify your browser or to store information or settings on your device. Web beacons (sometimes called transparent GIFs, clear GIFs, or web bugs) are small strings of code that provide a way for us to deliver a small graphic image (usually invisible) on a web page or in an email. Web beacons can recognize certain types of information on your device such as cookies, the time and date a page is viewed, a description of the page where the web beacon is placed, and when you open or click on links in our emails.

An SDK is a third-party computer code that allows our third-party service providers or partners to collect information about your use of our mobile apps for a variety of purposes, including to provide us with analytics, to integrate with social media platforms, to add features or functionality to our app, or to facilitate online advertising.

We use Tracking Technologies to administer the Services, including without limitation to:

- Authenticate Users
- Remember your preferences and settings
- Customize the content provided to you
- Determine the popularity of products or pages
- Deliver and measure the effectiveness of advertisements or advertising campaigns
- Improve our internal operations and the content of our Platform

We also may allow our partners to utilize Tracking Technologies on our Platform. Tracking Technologies utilized by these partners may be used to gather information about how you use with Platform, interact with advertisements, and your purchasing habits.

To learn more about cookies and similar Tracking Technologies, and how they can affect your privacy, visit www.allaboutcookies.org.

Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Your choices regarding Tracking Technologies are described in the Your Choices section below.

D. Interest-Based Advertising

We (or our partners) may use the information we collect through Tracking Technologies, to locate or try to locate the same unique users across multiple browsers or devices (such as smartphones, tablets, or computers). Specifically, this information may be used to tailor content and features presented to you and provide you with a seamless experience across devices. We may also use cross-device targeting to help identify you and serve advertising. If you wish to opt-out of cross device tracking for purposes of interest-based advertising, you may do so through your device settings. This type of advertising is often called “interest-based” or “personalized” advertising—and when it occurs on mobile apps, “cross-app” advertising.

You can learn more about interest-based advertising and how to opt-out of receiving certain tailored advertising by visiting (1) the Network Advertising Initiative’s Consumer [Opt-Out link](#) or (2) the Digital Advertising Alliance’s Consumer [Opt-Out link](#). To opt-out of Google Analytics for display advertising or

customize Google display network ads, you can visit the [Google Ads Settings page](#). Please see our [Interest Based Ads](#) page for more details.

3. How We Use Your Information

We may use information that we collect from you for the following purposes, or as otherwise identified at the time of collection:

A. Providing and Improving the Services

We may use Personal Information that we collect through your use of the Platform and Services to:

- Fulfill your orders
- Administer and manage your account
- Authenticate your identity
- Provide you with content, including, without limitation, generating recommendations
- Administer any contest or promotions, including winner notification and prize delivery
- Resolve your customer service questions and requests
- Deliver product recommendations or advertising
- Improve the Platform and Services

B. Communicate with You

We may use your Personal Information to communicate with you. For example, we may send you text messages or other notifications (such as “push notifications” through your mobile device) about the status of your orders and deliveries. If you have registered for the Platform, we may also email you with promotional offerings or other communications that may be of interest to you. If we send you marketing emails about services that may interest you, each email will contain instructions permitting you to “opt-out” of receiving future email marketing communications.

C. Data Aggregation

Additionally, we may use your Personal Information to create aggregated data records (collectively “Aggregate Data”). Some of this Aggregate Data is anonymous and/or de-identified. We anonymize and de-identify data by removing information (including any contact information) that would allow the remaining data to be linked back to you. We may use the Aggregate Data for internal purposes, such as analyzing patterns, program usage, demographic trends, and user behavior patterns and preferences to improve our Services and for other lawful purposes.

D. Compliance, Protection and Safety

We may use your Personal Information as we believe necessary to comply with any applicable laws, court orders, subpoenas; to respond to lawful requests by law enforcement, regulators, or government entities; to detect, prevent, investigate or combat possible crime, such as identity theft, or other fraudulent activity; to protect the security of our Platform and Services; to enforce or apply our online Terms of Service or other agreements; to protect our own rights or property or the rights, property, or safety of our users or others; and to investigate or address claims or disputes relating to the Services.

E. Analytics

We may use analytics, machine learning, and data models (“Analytics”) to support our data processing activities. Some of our Analytics rely upon Personal Information that we collect from you, your interactions and use of the Platform, and from third parties. Using this Personal Information, our Analytics allow us to tailor our Services to your specific needs and preferences, provide certain services to our partners, and develop new features.

4. How We Share and Disclose Your Information

We will only disclose Personal Information to the following entities, or as otherwise identified at the time of collection:

A. Retailers and Drivers

If you place an order using the Platform, we will share details about your identity with the retailers and drivers that will be fulfilling your order. Retailers and drivers will use this information to deliver the products you request to the appropriate address and to verify the age and identification of the individual receiving the order

B. Delivery Services

Our Riders/drivers will use this information to deliver the products you request to the appropriate address and to verify the age and identification of the individual receiving the order. We may share your Personal Information with these third parties as part of the Services

C. Other Users of the Platform

If you place a gift order, the individual receiving the gift may be notified that it was sent on your behalf. Additionally, if you write a review on the Platform, the name you provide at the time you post the review will be visible to all other Platform users.

D. Co-Branded Offerings

At certain times, we may provide you with access to deals, promotions, or opportunities (“Promotions”) in association with our partners. Such Promotions will identify the partner and indicate if they have a Privacy Notice that applies to their collection and use of your information. If you elect to register for

products and/or services, communicate with these partners, or download their content or applications as part of a Promotion, you may be providing your information to both Riel and the partner. If this is the case, we will provide disclosures as part of the Promotion. We are not responsible for our partner's data practices and you should carefully review each partner's Privacy Notices before participating in a Promotion that they are sponsoring.

E. Affiliates and Business Transfers

We may share your Personal Information with our parent company, subsidiaries, and affiliates for use consistent with this Privacy Notice.

Additionally, we may share your Personal Information in connection with, or during negotiations of, a transaction that alters the structure of our business, such as a reorganization, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or a portion of our business, assets or stock, including a bankruptcy or similar proceeding.

F. Service Providers

We provide data, including Personal Information, to vendors, consultants, research firms, and other service providers. These include:

- Payment processors and facilitators
- Background check and identity verification providers
- Cloud storage providers
- Data analytics providers
- Research partners, including those performing surveys or research projects in partnership with Riel or on Riel's behalf
- Vendors that assist Riel to enhance the safety and security of its apps
- Consultants, lawyers, accountants, and other professional service providers
- Insurance and financing partners

G. Corporate Clients

If a company (such as your employer) pays for your order or places an order on your behalf, we may share your Personal Information with that company so it can verify that you received your order.

H. Advertising Companies, Social Media Sites, and Brand Partners

We may provide your Personal Information to advertising companies (including marketing firms, audience analytics firms, advertising platforms, and consultants), social medial platforms, and brands that we partner with so that they (and Riel) can better understand your purchasing habits and

preferences. In some circumstances, we may also allow these companies to collect Personal Information directly from your browser or device through Tracking Technologies when you interact with our Platform. These companies may use the information we provide to determine how to direct advertisements and what individual or demographics to target, both on the Platform and elsewhere.

I. Compliance with Laws and Protection of Rights

We may disclose your Personal Information as we believe necessary to comply with any applicable laws, court orders, subpoenas; to respond to lawful requests by law enforcement, regulators, or government entities; to detect, prevent, investigate or combat possible crime, such as identity theft, or other fraudulent activity; to protect the security of our Platform and Services; to enforce or apply our online [Terms of Service](#) or other agreements; to protect our own rights or property or the rights, property, or safety of our users or others; and to investigate or address claims or disputes relating to the Services.

5. Communications with You

By registering for our Platform, you consent to receive communications from us. We may communicate with you via mail, text/SMS message, “push notifications” through your mobile device, and the Platform’s messaging functionality to share relevant information about the Platform, Services, and your orders. For details about our text/SMS practices, please review our [Terms of Service](#). Additionally, we may send your promotional or marketing materials as described below.

A. Promotional Emails

If you have registered for the Platform, we may send you promotional emails about our Platform, Services, or other materials that we believe may be of interest to you.

B. Promotional “Push Notifications”

If you have registered for the Platform, we may send you promotional “push notifications” through your mobile device.

C. Unsubscribing

You may unsubscribe from promotional emails by clicking the link at the bottom of any promotional email, through your preferences on the Platform, or by contacting us at privacy@riel.co.ke.

You may choose not to receive promotional “push notifications” by adjusting the “Notifications” settings in Riel mobile app or adjusting your device settings.

6. Your Choices

You may exercise control over your Personal Information in the following ways:

A. Previously Expressed Preferences

Privacy Policy - Riel

When you first register to use the Platform, you may set certain preferences as to how we use your Personal Information and communicate with you. If you are a Platform user, you may change those previously expressed preferences by visiting the “Profile & Settings” page once you are logged in.

B. Email communications

We include an “unsubscribe” link in each electronic newsletter or promotional e-mail we send you. If you no longer wish to receive such communications from us, please click that link and follow any additional instructions.

C. Tracking Technologies

Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. If you do not accept cookies, you may experience some inconvenience in your use of our Platform. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Platform.

You may opt out of receiving interest-based advertising on websites through members of the Digital Advertising Alliance by clicking [here](#). You may opt out of receiving targeted advertising in mobile apps through participating members of the Digital Advertising Alliance by installing the AppChoices mobile app, available [here](#), and selecting the user’s choices. Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms linked above.

Your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for interest-based advertising purposes

D. Updating and Correcting

If you are a registered Platform user, you have the ability to update or correct your Personal Information by accessing your profile page once you are logged in. If you are unable to make the necessary updates or corrections there, please contact us at privacy@riel.co.ke.

7. Notice to Users Outside Kenya

Riel is based in Kenya. Regardless of where you access the Platform or Services, the information collected as part of that use will be transferred to and maintained on servers located in Kenya. Any Personal Information that we obtain about you will be stored in Kenya where data protection laws may not be as protective as those applicable where you live. By using the Platform or Services, you consent to this collection, transfer, storage, and processing of information to and in the United States.

9. Data Protection

A. In General

Privacy Policy - Riel

We maintain a number of administrative, physical, and technological measures to protect the confidentiality, privacy, and security of your Personal Information. These controls vary based on the nature of the information. Unfortunately, no website, server or database is completely secure or "hacker proof." We therefore cannot guarantee that Personal Information you provide will not be disclosed, misused, or lost by accident or by the unauthorized acts of others.

B. Retention

We may retain Personal Information after we cease providing Services to you for the purpose of fraud monitoring, detection, and prevention. We also retain Personal Information to comply with our tax, accounting, and financial reporting obligations, as required by our contractual commitments, and as otherwise mandated by applicable law. When we retain data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

If you have consented to receive marketing materials from us, we will retain your Personal Information for as long as we have your consent to send you marketing materials. You may withdraw this consent at any time following the instructions in this Privacy Notice. Additionally, we indefinitely retain data that is anonymized, de-identified, and/or aggregated in a manner that removes identifiable Personal Information from it.

10. External Websites

Our Platform and Services may contain links to other websites. Please be aware that we are not responsible for the privacy practices of other websites, regardless of whether the link was provided by us or posted by a user on the Platform. Riel does not monitor the content, safety, or suitability of such external websites. As such, this Privacy Notice only applies to information collected by us through the Services or on the Platform. We do not control and are not responsible for any use of your Personal Information by or through any third-party sites. By clicking a link to an external website, you assume the risk that Personal Information you provide on that website may be viewed or used by third parties. When visiting any website, it is in your best interest to review that site's privacy notice and terms of service before providing any Personal Information.

11. Personal Information About Underage Users and Children

You must be at least twenty-one (18) years of age to access the Platform or Services in Kenya and of legal drinking age in your country to access the Platform and Services (the "Minimum Age" in that country). We do not knowingly request or collect Personal Information from any person under the Minimum Age. If a user submitting Personal Information is suspected of being younger than the Minimum Age in your jurisdiction, we will require the user to close his or her account, and we will also take steps to delete that person's information as soon as possible. If you know of any individuals under the Minimum Age using the Platform, please email us at privacy@riel.co.ke so we can take action to prevent such access.

12. Contact Riel

If you have any questions about this Privacy Notice or our privacy practices, or would like to contact Riel's Privacy Officer, please send an email to privacy@Riel.co.ke or by write to us at:

Riel Creations LTD,
Attn: Privacy Officer
P.o Box 7075-0100
Thika
Kigio Plaza

13. Updates

We may occasionally update this Privacy Notice. If we make material changes, we will notify users by updating the "last updated" date at the top of this Privacy Notice. Your continued use of our Platform or Services after we have posted the revised Privacy Notice constitutes your agreement to be bound by the revised Privacy Notice to the extent permitted by law.