

Privacy Policy

Last updated: 15 October, 2014

At Qikli, it is our intent to give you as much control as possible over your privacy in regards to your personal information and how we use it in our business. In general, you can visit Qikli on the web without telling us who you are or revealing any information about yourself. This Privacy Policy applies to your visit to Qikli's website at <http://www.Qikli.com>, <http://engage.Qikli.com>, or (the "**Website**"). This Privacy Policy governs your access to our Website whether as a visitor or a registered user (a "**User**"). By using our Website, you consent to the collection, use, disclosure, and other uses of personal information pursuant to this Privacy Policy.

A. **What Information We Gather and Track**

There are times when we may need information from you. This generally involves filling out forms so you can download or order a Qikli product. When you download our products, we require you to fill out a form with your name and email address. If you wish to remove yourself from our mailing lists at any time, you may do so by contacting our customer care department, by email customercare@Qikli.com or phone +233 (0)303-411045.

When you submit an order online, your credit card number is submitted to the credit institution for routine processing. Your personal credit history information is **not** collected by Qikli, and Qikli does not share credit or credit card information with other companies or third parties.

B. **What We Do With the Information We Gather and Track**

The information gathered from the forms you fill out is used in one of three ways:

1. To provide you with information about products, services, news and events by sending newsletters, promotions and site updates;
2. To allow you to purchase and download products; and

3. To gather broad demographic information about user trends.

C. **Sharing and Usage**

We will never share, sell, or rent your personal information with third parties for their promotional use. We may also disclose information to partners who introduced you to Qikli services in order to ensure they are properly compensated for their efforts. Lastly, we may disclose or report personal information in limited circumstances where we believe in good faith that disclosure is required under the law. For example, we may be required to disclose personal information to cooperate with regulators or law enforcement authorities, to comply with a legal process such as court order, subpoena, search warrant, or law enforcement request.

D. **Personal Information**

1. 'Personal information' shall have the meaning attributed to such terms within the provisions of Section 96 of the **Data Protection Act, 2012**, Act 843 of Ghana ("**Personal Information**"). Each party shall comply with the provisions of Act 843 and with their own respective privacy policies and procedures with respect to all Personal Information which is collected, used, or disclosed by either party pursuant to this Privacy Policy.
2. Each party shall cease all use of all Personal Information received from the other party pursuant to this Privacy Policy upon any termination or expiry of this Privacy Policy and promptly return same to the other party by a secure means without delay.
3. Each party shall defend, indemnify, and hold the other party harmless from and against any and all claims suffered or incurred by the other party at any time or times as a result of any alleged and/or actual breach by that party of the provisions of Act 843 and/or any of the provisions contained in this section.
4. You may wish to request information about our products and services. To facilitate the distribution of this content, you are asked to provide information, such as, but not limited to, name, company, title, phone number, e-mail address, site name, URL, and address. Based on your request, we may also ask for additional information, such as number of page views your company's site receives, how many orders your company's site receives, and how you heard about us. This information is provided by you on a

voluntary basis only and is not required by us in order for you to use and enjoy the Website.

5. We may also collect log-in information, such as user name and account name, of our customers' internal users that log-in to products on the Website. Such user information may be associated with a user's individual visitation activity whether or not he/she/it is logged-in to the products at such time.

E. Updating/Accessing/Amending/Correcting Personally Identifiable Information

If your personally identifiable information changes, or if you no longer desire our service, you may make changes on our member information page, by email to customer care at customercare@Qikli.com, or by contacting us by telephone or postal mail at the contact information listed below. We will do our best to respond to your request to access within 10 days.

F. Third Party Personally Identifiable Information

In the log-in portion of the Website, site administrators will have permission to enter third party information, such as email address and name to create accounts for the users. This information is only used for the purpose intended and for no other purpose.

G. Information Use and Disclosure

1. We may use the information that we collect on the Website to contact you to further discuss your interest in Qikli, our services, and to send information regarding Qikli or partners, such as marketing promotions and events. This information may also be used to improve the services we provide to you and your company. The information is collected and stored in a manner that we determine is appropriate for the nature of the data that we collect, and the need to fulfill your request. This information is not provided to third parties for their own use, unless specifically authorized by you. Qikli does not share, sell, rent, or trade Personal Information with third parties for their promotional purposes without your consent.
2. We use third party service providers to provide automated data processing, marketing automation, data appends, contact discovery, and delivery services on the Website for our own purposes. When you sign up for certain of our services, we may share your

personally identifiable information as necessary for one or more third parties to provide that service. These third parties are prohibited from using your personally identifiable information for any other purpose.

3. We may disclose Personal Information when required by law, or in order to comply with a current judicial proceeding, a court order, or legal process served on us. Certain Personal Information that we collect on the Website may be distributed among ourselves or other third parties solely for the purposes of processing your request or arranging delivery of your subscription, product, or service that you have requested. We may store and process Personal Information in Ghana, the United States, or any other country in which we (or any of our agents) maintain facilities.

H. **Ten Privacy Principles of Fair Information Practices**

1. *Accountability* - Qikli is responsible for personal information under its control and to this end Qikli has appointed a privacy officer who is accountable for Qikli's compliance with this Privacy Policy and applicable privacy laws. The contact information for the Privacy Officer is outlined in section "R" of this Privacy Policy.
2. *Identifying Purposes* – Qikli will identify the purposes for collecting personal information prior to or at the time it is collected. Qikli will also obtain your consent before your personal information is used or disclosed for a new purpose unless such use or disclosure is permitted without your consent pursuant to applicable privacy laws.
3. *Consent* – Unless an exemption applies under applicable privacy laws, your knowledge and consent is required for the collection, use, or disclosure of Personal Information. If you use or register for the Website, request information about services offered by Qikli, or otherwise provide your Personal Information to Qikli, you consent to the collection, use, disclosure and management of your Personal Information in accordance with this Privacy Policy. You may withdraw your consent by writing to the Privacy Officer identified in section "R" of this Privacy Policy.
4. *Limiting Collection* – Qikli will limit the collection of Personal Information to that which is necessary for the purposes identified by Qikli in this Privacy Policy or otherwise identified at the time of collection. Qikli will collect Personal Information by fair and lawful means.

5. *Limiting Use, Disclosure, and Retention* – Qikli will only use or disclose your Personal Information for the purpose for which it was collected except with your consent or as permitted by law. Personal Information will only be retained as long as necessary for the fulfillment of such purposes.
6. *Accuracy* – Qikli will keep Personal Information as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
7. *Safeguarding Customer Information* – Qikli protects Personal Information with safeguards appropriate to the sensitivity of the information by maintaining appropriate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of Personal Information. Qikli keeps the Personal Information that it collects about you strictly confidential. Only authorized personnel have access to this Personal Information. Qikli cannot guarantee that any Personal Information that you may choose to disclose via the internet will not be intercepted by third parties. Qikli assumes no responsibility for Personal Information disclosed through the internet, which is intercepted, diverted or otherwise accessed.
8. *Openness* – Specific information about our policies and practices relating to the management of Personal Information is available to you on the Website. For further information on Qikli’s personal information management policies and practices, please contact the Privacy Officer identified in section “R” of this Privacy Policy.
9. *Individual Access* – You can ask to view your Personal Information held by Qikli by writing to the Privacy Officer identified in section “R” of this Privacy Policy. Where necessary you can request that corrections be made where you can show that the Personal Information about you held by Qikli is incorrect or incomplete.
10. *Challenging Compliance* – You are able to address and challenge Qikli’s compliance with the above principles and this Privacy Policy by contacting the Privacy Officer identified in section “R” of this Privacy Policy or under applicable law.

I. **Blogs and Testimonials**

If you use a blog on the Website, you should be aware that any personally identifiable information you submit there can be read, collected, or used by other Users of these forums, and could be used to send you unsolicited messages. We are not responsible

for the personally identifiable information you choose to submit in these forums. Some of our clients have chosen to post testimonials on our Website. Users hereby provide their approval for Qikli to post their personally identifiable information along with these testimonials.

J. **Live Chat**

We use live chat to assist any person with questions regarding the Website (the "**Live Chat**"). If our Live Chat is offline we will collect your name and email address so that we may reply to your request. This information is only used for the purpose intended and for no other purpose.

K. **Use of Cookies**

Cookies are small files that a website or its service provider transfers to your computer's hard drive through your web browser that enables websites or service providers' systems to recognize your browser and remember certain information.

We use cookies to ensure you obtain the information you request. The cookies we pass to you are anonymous. They do not reveal your personal identity, they will not follow you throughout your travels on the web, nor can they capture private data. Rather, these cookies establish a user session and allow our server to correctly provide those who use the Website with the appropriate frames and content.

We are not concerned with who is using our Website, but rather how our Website is being used. We track the usage in order to modify the site according to our customers' needs. We pay attention to what information is requested and attempt to make it easier to find in the future. Please understand that any data captured from this system is for internal use only and is not shared with anyone else.

L. **Security and Integrity of Information**

1. We treat our data as assets that must be protected against loss and unauthorized access. We employ information security techniques to appropriately protect confidential information from unauthorized access by users inside and outside Qikli. Access to customer information is limited to those employees who have a legitimate business need for that information.

2. Internet sites and their supporting systems, employ generally accepted information security techniques such as firewalls, access control procedures and cryptography to appropriately protect confidential information from unauthorized access.
3. In the event of a breach of your personal information or your contact information we will notify you as soon as we become aware of such a breach, and shall follow up with additional information, including what action was taken to limit or correct such a breach.

M. Clients are Responsible for Protecting Information and Systems on their Premises

Some information about Users is stored in systems located on User premises. Users concerned about the security of their information in these systems should secure it by activating passwords and using physical access controls.

N. Content of Messages

When you send messages via any form of telecommunication, that message is transmitted between multiple points in order to reach its intended destination. Messages sent via Qikli should not be used to deliver confidential information.

We may review the content of User messages in order to ensure that they comply with our Terms of Use. We may do this manually or we may scan your message content with software to ensure that the content meets our requirements.

O. Opt-out and Update Policies

We offer visitors to the Website a means for controlling the use of session information. If, at any time after registering for information or ordering our services, you change your mind about receiving information from us or about the use of information volunteered by you, please send us a request specifying your new choice to compliance@Qikli.com. To opt out of marketing or promotional emails, please either click unsubscribe in the body of the email communication or send an email to unsubscribe@Qikli.com.

P. Changes and Updates to the Privacy Policy

Qikli's website content and features may be updated, revised, modified and supplemented. Qikli reserves the right to change the information, features, products, policies, promotions, disclosures and disclaimers at any time. Changes to this Privacy Policy will be posted on our websites. Please check the policy periodically for changes. At the end of the policy we indicate the date of an update to the Privacy Policy. The continued use of the Qikli websites following the posting of changes to this Privacy Policy will mean you accept those changes. If there is a material change in our data collection, use or disclosure policies for any of our services, Qikli will post this within the site as method of to update our users.

Q. Contacting Us About Privacy

If you wish to unsubscribe from Qikli's or client's mailing list please send an email to compliance@Qikli.com

If you have questions about this privacy statement, the practices of this website, or your dealings with our company, please contact us at the mailing address below:

DreamOval Limited
2nd Floor Crystal Plaza Building
Lashibi, Accra
PMB CT498

Ghana

If you have any questions or concerns regarding this Privacy Policy, you should first contact Francis Ahene-Affoh, our Privacy Officer, at compliance@Qikli.com or by telephone at +233 303-411045. If you do not receive acknowledgment of your inquiry or your inquiry has not been satisfactorily addressed, you should contact WASPAG at <http://www.waspag.com/viewform3.htm> . WASPAG will then serve as a liaison with us to resolve your concerns.

R. Partners and Programs

1. *WASPAG* – We are a member of the Wireless Applications Service Providers Association of Ghana. WASPAG was established in December 2012 by leading companies within the mobile VAS and applications market to 1.) Ensure WAS customers in Ghana receive world-class services 2.) Ensure industry stakeholders earn a fair return on their

investments, 3.) Ensure that members work for the mutual benefit of the association.
4.) Provide a platform for addressing the concerns and complaints of the public relating to services provided by members. As Qikli wants to demonstrate its commitment to your privacy, it has agreed to disclose its information practices and have its privacy practices monitored for compliance by WASPAG. This Privacy Policy covers the Website and any and all sub-domains thereof.

2. *National Communications Authority (NCA-GHANA)* – We are a fully licensed VAS Provider under the NCA. By registering with the NCA we have made a commitment to meet the Regulatory Body’s strict requirements as well as all relevant Laws and Regulations of the Republic of Ghana.