

Sage Grey Technologies Limited

Nkiru Privacy Policy

Last updated: 26th June 2025

Nkiru's Privacy Commitment

We let customers know the information we have on them and allow them to opt out of specific engagements. The goal of this policy is to make explicit the information we gather, how we will use it, and how we will not.

Scope of this Privacy Policy

This Privacy Policy applies to all Nkiru websites that link to it. It also applies to the products and services provided by Nkiru through these websites, our mobile applications, and applications posted by Nkiru on third-party online marketplaces. This Privacy Policy does not apply to any of our websites, products or services that have a separate privacy policy.

This Privacy Policy is divided into three parts:

Part I – Information Nkiru collects and controls

This part deals with how Nkiru collects and uses information about website visitors, potential customers, users of Nkiru's products and services, and others who contact Nkiru through forms or email addresses published on or linked to our websites.

Part II – Information that Nkiru processes on your behalf

This part deals with how Nkiru handles data that you entrust to Nkiru when you use our products and services, or when you share any personal or confidential information with us while requesting customer support.

Part III – General

This part deals with topics that are relevant to both Parts I and II and other general topics such as Nkiru's security commitments and how we will inform you when we change this Privacy Policy.

Part I – Information Nkiru collects and controls

What information Nkiru collects

We collect information about you only if we need the information for some legitimate purpose. Nkiru will have information about you only if (a) you have provided the information yourself, (b) Nkiru has automatically collected the information, or (c) Nkiru has obtained the information from a third party. Below we describe the various scenarios that fall under each of those three categories and the information collected in each one.

Information that you provide us

i. Account signup: When you sign up for an account to access one or more of our services, we ask for information like your name, contact number, email address, business information and company name to complete the account signup process. You'll also be required to choose a unique username and a password for accessing the created account. After signing up, you will have the option of choosing a security question and an answer to the security question — if you provide these, they will be used only while resetting your password.

ii. Event registrations and other form submissions: We record information that you submit when you (i) register for any event, including webinars or seminars, (ii) subscribe to our newsletter or any other mailing list, (iii) submit a form in order to download any product or other materials, (iv) participate in contests or respond to surveys, or (v) submit a form to request customer support, get a quote or to contact Nkiru for any other purpose.

iii. Payment processing: When you pay for any service(s) that Nkiru offers, we ask you to provide your name, contact information, business information and credit card information or other payment account information. When you submit your card information, we store the name and address of the cardholder, the expiry date and the last four digits of the credit card number. We do not store the actual credit card number. For quick processing of future payments, if you have given us your approval, we may store your credit card information or other payment information in an encrypted format in the secured servers of our Payment Gateway Service Providers.

iv. Testimonials: When you authorize us to post testimonials about our products and services on websites, we may include your name and other personal information in the testimonial. You will be given an opportunity to review and approve the testimonial before we post it.

v. Interactions with Nkiru: We may record, analyze and use your interactions with us, including email, telephone, and chat conversations with our sales and customer support professionals, to improve our interactions with you and other customers.

N/B: By providing us with your personal information, you consent to our processing your information, including any of the same which is particularly sensitive.

Information that we collect automatically

i. Information from browsers, devices and servers: When you visit our websites, we collect information that web browsers, mobile devices and servers make available, such as the internet protocol address, browser type, language preference, time zone, referring URL, date and time of access, operating system, mobile device manufacturer and mobile network information. We include these in our log files to understand more about visitors to our websites.

ii. Information from cookies and tracking technologies: We use temporary and permanent cookies to identify users of our services and to enhance user experience. We embed unique identifiers in our downloadable products to track usage of the products. We also use cookies, beacons, tags, scripts, and other similar technologies to identify visitors, track website navigation, gather demographic information about visitors and users, understand email campaign effectiveness and target visitor and user engagement by tracking your activities on our websites. We also use HTML5 to store content information and preferences to provide certain features.

iii. Information from application logs and mobile analytics: We collect information about your use of our products, services and mobile applications from application logs and in-house usage analytics tools, and use it to understand how your use and needs can improve our products. This information includes clicks, scrolls, features accessed, access time and frequency, errors generated, performance data, storage utilized, user settings and configurations, and devices used to access and their locations.

iv. Technical information: we automatically collect device information, IP addresses, browser type, operating system, session duration and usage patterns to ensure service functionality and security.

v. *Voice recordings*: For quality assurance and training purposes, voice recordings are processed to convert speech or text. By calling or using the voice features, you consent to the collection and processing of your voice data as described in this policy.

Information that we collect from third parties

i. *Signups using federated authentication service providers*: You can log in to Nkiru Services using supported federated authentication service providers such as LinkedIn, Microsoft and Google. These services will authenticate your identity and give you the option to share certain personal information with us, such as your name and email address.

ii. *Referrals*: If someone has referred any of our products or services to you through any of our referral programs, that person may have provided us your name, email address and other personal information. You may contact us at privacy@withnkiru.com to request that we remove your information from our database. If you provide us information about another person, or if another person gives us your information, we will only use that information for the specific reason for which it was provided to us.

iii. *Information from our reselling partners and service providers*: If you contact any of our reselling partners, or otherwise express interest in any of our products or services to them, the reselling partner may pass your name, email address, company name and other information to Nkiru. If you register for or attend an event that is sponsored by Nkiru, the event organizer may share your information with us. Nkiru may also receive information about you from review sites if you comment on any review of our products and services, and from other third-party service providers that we engage for marketing our products and services.

iv. *Information from social media sites and other publicly available sources*: When you provide feedback or reviews about our products, interact, or engage with us on marketplaces, review sites or social media sites such as Meta, Twitter, LinkedIn and Instagram through posts, comments, questions and other interactions, we may collect such publicly available information, including profile information, to allow us to connect with you, improve our products, better understand user reactions and issues, or to reproduce and publish your feedback on our websites. We must tell you that once collected; this information may remain with us even if you delete it from these sites. Nkiru may also add and update information about you, from other publicly available sources.

Purposes for using information

In addition to the purposes mentioned above, we may use your information for the following purposes:

- To communicate with you (such as through email) about products that you have downloaded and services that you have signed up for, changes to this Privacy Policy, changes to the Terms of Service, or important notices;
- To keep you posted on new products and services, upcoming events, offers, promotions and other information that we think will be of interest to you;
- To ask you to participate in surveys, or to solicit feedback on our products and services; Analyze usage patterns to enhance service functionality and user experience.
- To set up and maintain your account, and to do all other things required for providing our services, such as enabling collaboration, providing website and mail hosting, and backing up and restoring your data;

- To understand how users use our products and services, to monitor and prevent problems, and to improve our products and services;
- To provide customer support, and to analyze and improve our interactions with customers;
- To detect and prevent fraudulent transactions and other illegal activities, to report spam, and to protect the rights and interests of Nkiru, Nkiru's users, third parties and the public;
- To update, expand and analyze our records, identify new customers, and provide products and services that may be of interest to you;
- To analyze trends, administer our websites, and track visitor navigations on our websites to understand what visitors are looking for and to better help them;
- To monitor and improve marketing campaigns and make suggestions relevant to the user.
- To comply with legal obligations and protect our legal rights.

Legal bases for collecting and using information

Legal processing bases applicable to Nkiru: Most of our information collection and processing activities are typically based on (i) contractual necessity, (ii) one or more legitimate interests of Nkiru or a third party that are not overridden by your data protection interests, or (iii) your consent. Sometimes, we may be legally required to collect your information or may need your personal information to protect your vital interests or those of another person.

Withdrawal of consent: Where we rely on your consent as the legal basis, you have the right to withdraw your consent at any time, but this will not affect any processing that has already taken place.

Legitimate interests notice: Where we rely on legitimate interests as the legal basis and those legitimate interests are not specified above, we will clearly explain to you what those legitimate interests are at the time that we collect your information.

Your choice in information use

Opt out of non-essential electronic communications: You may opt out of receiving newsletters and other non-essential messages by using the 'unsubscribe' function included in all such messages. However, you will continue to receive essential notices and emails such as account notification emails (password change, renewal reminders, etc.), security incident alerts, security and privacy update notifications, and essential transactional and payment-related emails.

Disable cookies: You can disable browser cookies before visiting our websites. However, if you do so, you may not be able to use certain features of the websites properly.

Optional information: You can choose not to provide optional profile information such as your photo. You can also delete or change your optional profile information. You can always choose not to fill in non-mandatory fields when you submit any form linked to our websites.

Who we share your information with

All Nkiru group entities have access to the information covered in Part I. We do not sell any personal information. We share your information only in the ways that are described in this Privacy Policy, and only with parties who adopt appropriate confidentiality and security measures.

Employees and independent contractors: Employees and independent contractors of relevant Nkiru group entities have access to the information covered in Part I on a need-to-know basis. We require all employees and independent contractors of Nkiru group entities to follow this Privacy Policy for personal information that we share with them.

Third-party service providers: We may need to share your personal information and aggregated or de-identified information with third-party service providers that we engage, such as marketing and advertising partners, cloud hosting, analytics, AI processing services, event organizers, web analytics providers and payment processors. These service providers are authorized to use your personal information only as necessary to provide these services to us.

Reselling partners: We may share your personal information with our authorized reselling partners in your region, solely for the purpose of contacting you about products that you have downloaded or services that you have signed up for. We will give you an option to opt out of continuing to work with that partner. All service providers are contractually bound to protect your information.

Marketplace application developers: When you install or purchase any application developed using Nkiru's APIs that are posted on Nkiru's website, your name and email address will be shared with the developer of the application, so they may engage with you directly as the provider of that application or service. Nkiru does not control the use of your personal information by the developers, which will be based on their own privacy policies.

Legal Requirements: we may disclose information when required by law, legal process or government request, to protect our rights, property or for compliance purposes.

Other cases: Other scenarios in which we may share the same information covered under Parts I and II are described in Part III.

Your rights with respect to information we hold about you as a controller

Right to rectification: You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you to our database.

Right to erasure: You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.

Right to data portability: You have the right to transfer your information to a third party in a structured, commonly used and machine-readable format, in circumstances where the information is processed with your consent or by automated means.

Right to object: You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.

Right to complain: You have the right to complain to the appropriate supervisory authority if you have any grievance against the way we collect, use or share your information. This right may not be available to you if there is no supervisory authority dealing with data protection in your country.

Retention of information

We retain your personal information for as long as it is required for the purposes stated in this Privacy Policy. Sometimes, we may retain your information for longer periods as permitted or

required by law, such as to maintain suppression lists, prevent abuse, if required in connection with a legal claim or proceeding, to enforce our agreements, for tax, accounting, or to comply with other legal obligations. When we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store the information and isolate it from further processing on backup discs until deletion is possible.

Part II – Information that Nkiru processes on your behalf

Information entrusted to Nkiru and purpose

Information provided in connection with services: You may entrust information that you or your organization (“you”) control, to Nkiru in connection with the use of our services or for requesting technical support for our products. This includes information regarding your customers and your employees (if you are a controller) or data that you hold and use on behalf of another person for a specific purpose, such as a customer to whom you provide services (if you are a processor). The data may either be stored on our servers when you use our services or transferred or shared with us as part of a request for technical support or other services.

(All the information entrusted to Nkiru is collectively termed “service data”)

Ownership and control of your service data

We recognize that you own your service data. We provide you complete control of your service data by providing you with the ability to (i) access your service data, (ii) share your service data through supported third-party integrations, and (iii) request export or deletion of your service data.

How we use service data

We process your service data when you provide us with instructions through the various modules of our services. For example, when you generate an invoice using our invoicing service, information such as the name and address of your customer will be used to generate the invoice.

Push notifications

If you have enabled notifications on our desktop and mobile applications, we will push notifications through a push notification provider such as Apple Push Notification Service, Google Cloud Messaging or Windows Push Notification Services. You can manage your push notification preferences or deactivate these notifications by turning off notifications in the application or device settings.

Who we share service data with

Nkiru and third-party sub-processors: In order to provide services and technical support for our products, the contracting entity within Nkiru engages other group entities and third parties.

Employees and independent contractors: We may provide access to your service data to our employees and individuals who are independent contractors of Nkiru involved in providing the services (collectively our “employees”) so that they can (i) identify, analyze and resolve errors, (ii) manually verify emails reported as spam to improve spam detection, or (iii) manually verify scanned images that you submit to us to verify the accuracy of optical character recognition. We ensure that access by our employees to your service data is restricted to specific individuals. Our employees will also have access to data that you knowingly share with us for technical support or

to import data into our products or services. We communicate our privacy and security guidelines to our employees and strictly enforce privacy safeguards within our group of companies.

Third-party integrations you have enabled: Most of our products and services support integrations with third-party products and services. If you choose to enable any third-party integrations, you may be allowing the third party to access your service data and personal information about you. We encourage you to review the privacy practices of the third-party services and products before you enable integrations with them.

Other cases: Other scenarios in which we may share information that is common to information covered under Parts I and II are described in Part III.

Retention of information

We hold the data in your account as long as you choose to use Nkiru's Support Services. Once you terminate your Nkiru user account, your data will eventually get deleted from active database during the next clean-up although we may retain your data in line with the retention period under Nigerian Law.

Data subject requests

Please contact the customer support if you would like to access, rectify, erase, restrict or object to processing, or export your personal data. We will extend our support to our customers in responding to your request within a reasonable timeframe.

Part III – General

How secure is your information

At Nkiru, we take data security very seriously. We have taken steps to implement appropriate administrative, technical & physical safeguards to prevent unauthorized access, use, modification, disclosure or destruction of the information you entrust to us. If you have any concerns regarding the security of your data, we encourage you to write to us at privacy@withnkiru.com with any questions. We implement industry standard security measures including: Vulnerability Assessment and Penetration Testing (VAPT), encrypting of data in transit and at rest, regular security assessments and monitoring, access controls and authentication measures, employee training on data protection practices among others.

Data Protection Officer

We have appointed a Data Protection Officer to oversee our management of your personal information in accordance with this Privacy Policy. If you have any questions or concerns about our privacy practices with respect to your personal information, you can reach out to our Data Protection Officer by sending an email to privacy@withnkiru.com.

Locations and international transfers

We share your personal information and service data within the our Group and with third parties engaged by our Group for the purposes described above. By accessing or using our products and services or otherwise providing personal information or service data to us, you understand that the processing, transfer, and storage of your personal information or Service Data within the Nigeria and other countries where Nkiru operates. Such transfers are subject to appropriate data protection agreements such as a group company agreement. When we transfer data internationally, we ensure appropriate safeguards are in place including: standard contractual

clauses approved by regulatory bodies and other lawful transfer mechanisms as required by applicable law.

Automation and Artificial Intelligence

In order to provide enhanced productivity and predictive capabilities to our users, we employ a variety of technologies parsing, template matching, artificial intelligence and machine learning. In keeping with Nkiru's promise not to exploit your data in a way that is not respectful of your privacy and confidentiality expectations, we make only the following limited use of service data for these technologies: (i) using anonymized crops of service data to improve accuracy of the algorithms; and (ii) using your organization's data for developing models specific for your organization. Our automation and artificial intelligence technologies are mostly powered by our own organization's data such as internal communications, communications with customers and internal documents as well as free and paid external sources.

External links on our websites

Some pages of our websites may contain links to websites that are not linked to this Privacy Policy. If you submit your personal information to any of these third-party sites, your personal information is governed by their privacy policies. As a safety measure, we recommend that you not share any personal information with these third parties unless you've checked their privacy policies and assured yourself of their privacy practices.

Social media widgets

Our websites include social media widgets such as Facebook "like" buttons and Twitter (X) "tweet" buttons that let you share articles and other information. These widgets may collect information such as your IP address and the pages you navigate in the website, and may set a cookie to enable the widgets to function properly. Your interactions with these widgets are governed by the privacy policies of the companies providing them.

Disclosures in compliance with legal obligations

We may be required by law to preserve or disclose your personal information and service data to comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements.

Enforcement of our rights

We may disclose personal information and service data to a third party if we believe that such disclosure is necessary for preventing fraud, spam filtering, investigating any suspected illegal activity, enforcing our agreements or policies, or protecting the safety of our users.

Business Transfers

We do not intend to sell our business. However, in the unlikely event that we sell our business or get acquired or merged, we will ensure that the acquiring entity is legally bound to honour our commitments to you. We will notify you via email or through a prominent notice on our website of any change in ownership or in the uses of your personal information and service data. We will also notify you about any choices you may have regarding your personal information and service data.

Compliance with this Privacy Policy

We make every effort, including periodic reviews, to ensure that personal information you provide is used in conformity with this Privacy Policy. If you have any concerns about our adherence to

this Privacy Policy or the manner in which your personal information is used, kindly write to us at privacy@withnkiru.com We'll contact you, and if required, coordinate with the appropriate regulatory authorities to effectively address your concerns.

Notification of changes

We may modify the Privacy Policy at any time, upon notifying you through a service announcement or by sending an email to your primary email address. Your continued use after the effective date of changes to the Privacy Policy will be deemed to be your agreement to the modified Privacy Policy.

Contact information for Privacy Requests

To exercise your privacy rights or submit questions about this policy contact us at:

Email: privacy@withnkiru.com

DPO Officer No:

We will respond to your request within 14 business days of receipt, or as otherwise required by applicable law.