KIBO TECHNOLOGY LIMITED

PRIVACY NOTICE

1. Introduction/Scope

This document is prepared in accordance with the provisions of the EU General Data Protection Regulation (GDPR) and the Nigerian Data Protection Act (NDPA). It sets out how **Kibo Technology Limited** (**Kibo Technology**) applies and complies with the principles of the Act in processing the personal data of individuals, clients, vendors, and even third parties that interact with Kibo Technology.

For personal data of individuals, this document also highlights their rights and covers the data subject(s) whose personal data is collected and processed in compliance with the GDPR/NDPA.

2. Roles and Responsibilities

Roles	Responsibilities
Data Protection Officer	• To ensure that this notice is correct and up-to-date, and bring this notice to the awareness of data subjects prior to the collection and processing of personal data by the Kibo Technology**,** including on Kibo Technology's website.
All Employees/Staff who interact with personal data	• To follow the provisions of this policy document. • To seek the consent of data subject(s) for the secure processing of their personal data. • To ensure that this notice is brought to the attention of the data subject(s).

3. Policy Statement

3.1 Who We Are

At Kibo Technology Limited, we are a Sports Betting, Casino Games, Virtual Sports, Esports, Poker, and other gaming activities.

3.2 What Personal Data Do We Need?

The personal data we would collect and process, depending on the particular processing requirement, are under the following categories:

Personal Data Type	Sources
Identity Data	Full name, date of birth, government-issued identification numbers (e.g., international passport, national ID card, driver's license), proof of address, photograph.

Contact Data	Residential address, email address, telephone number.
Financial Data	Bank account details, payment card information, transaction history, source of funds information.
Technical Data	Internet protocol (IP) address, device information (type, operating system), browser type and version, time zone setting, browser plug-in types, pages visited and navigation paths, and other technology on the devices used to access our website.
Profile Data	Username and password, betting history, preferences, feedback, and survey responses.
Marketing and Communications Data	Preferences in receiving marketing from us and our third parties.

In certain instances, the personal data we need to collect may fall under a special category of personal data, which includes: race, political opinion, ethnic origin, religion, philosophical believes, genetic/biometric data, health record, sex life/sex orientation, criminal records, or alleged criminal activity. In such instances, our lawful basis of processing will be the explicit consent of the data subject,

compliance with a legal obligation, or for legal proceedings/advice.

3.3 Why Do We Need the Data?

Kibo Technology ensures that the personal data collected and processed is necessary for the purpose of collection, and Kibo Technology shall not collect or process more data than is reasonably required for a particular processing activity. In addition, every processing purpose has at least one lawful basis for processing to safeguard the rights of the data subjects, as listed below:

Purpose of Processing	Lawful Basis of Processing
Account Management & Service Provision	To register you as a new customer, create and manage your account, process deposits and withdrawals, and provide you with the requested gaming and betting services.
Legal and Regulatory Compliance	To verify your age and identity, undertake anti-money laundering (AML) and fraud prevention checks, comply with responsible gambling obligations, and fulfill our legal and regulatory reporting duties.
Legitimate Interests	To manage our business operations, provide customer support, improve our services and website functionality, ensure network and information security, perform data analytics, and

	for the establishment, exercise, or defense of legal claims.
Marketing	To send you promotional offers, updates, and information about new products, provided we have your explicit consent where required by law.

Where Legitimate Interest is considered the legal basis for processing personal data, Kibo Technology shall follow the steps below in carrying out a Legitimate Interest Assessment.

1. Determine the Purpose for Processing

In carrying out the purpose test, Kibo Technology must establish the exact reason for the processing and how it benefits the organisation. Answers to the following shall be provided to determine the exact purpose for processing:

- Description of the processing objective
- The likelihood of meeting the objective and how to determine if the objective was met
- The benefit of the processing and the significance to the organisation
- Description of the possible impact of not processing and any other issues that might be relevant

2. Determine the Necessity of the Processing

Kibo Technology must establish why the processing must take place, how the processing relates to the expected benefits, and any other alternatives and why there were not considered.

3. Balance the identified interest with the Privacy Interest of the Data Subjects
The following questions will be addressed under the balance test:

- Who are the data subjects (category)?
- What is the relationship between Kibo Technology and the data subject
- What personal data is to be processed
- How will the processing impact the data subject
- How will the data subject react to the processing

Kibo Technology records this information in line with this policy, data protection impact assessment, and data inventory.

4. Consent

Kibo Technology requires your explicit consent to process collected personal data. And by consenting to this privacy policy, you are giving us the permission to use/process your personal data specifically for the purpose identified before collection.

If, for any reason, Kibo Technology is requesting sensitive personal data from you, you will be rightly notified why and how the information will be used.

You may withdraw consent at any time by requesting for Withdrawal of Consent form, following the Kibo Technology Withdrawal of Consent Procedure.

5. Disclosure

Kibo Technology will not pass on your personal data to third parties without first obtaining your consent.

The following third parties will receive your personal data for the following purpose(s) as part of the processing activities.

Foreign Country/International Organisation	Safeguards in place to protect your personal data	Retrieve a copy of the safeguards in place here:

Where there is a need for a third party to process the personal data of data subjects, Kibo Technology will enter into a Data Processing Agreement with the third party and be satisfied that the third party has adequate measures in place to protect the data against accidental or unauthorised access, use, disclosure, loss, or destruction.

In a case where the disclosure is to third parties outside the jurisdiction of the GDPR and NDPA, Kibo Technology will ensure that the third party meets the core regulatory standards prior to the transfer. This may include transferring the personal data to the third party where Kibo Technology has satisfied that:

- the country of the recipient has adequate data protection controls established by legal or self-regulatory regime
- Kibo Technology has a contract in place that uses existing or approved data protection clauses to ensure adequate protection
- Kibo Technology is making the transfer under approved binding corporate rules
- Kibo Technology is relying on approved codes of conduct or certification mechanisms, together with binding and enforceable commitments in the foreign country or international organisation to apply the appropriate safeguards in relation to data subject rights
- Provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority

6. Retention of Records

In compliance with the GDPR/NDPA data retention policy, Kibo Technology will process your personal data for three years from the date of collection and will retain the personal data for three years.

This retention period has been established to enable us use the personal data for the necessary legitimate purposes identified, in full compliance with the legal and regulatory requirements. When we

no longer need to use your personal information, we will delete it from our systems and records, and/or take steps to encrypt/anonymise it to protect your identity as the case may be.

7. Data Subject Rights

Data subjects, according to the provision of the GDPR/NDPA, have certain rights. At any point while Kibo Technology are in possession of or processing your personal data, you, the data subject, have the right to:

- Request a copy of the information that we hold about you
- Correct the data that we hold about you that is inaccurate or incomplete
- Ask for the data we hold about you to be erased from our systems/record
- Restrict processing of your personal data where certain conditions apply
- Have the data we hold about you transferred to another organisation
- Object to certain types of processing like direct marketing
- Object to automated processing like profiling, as well as the right to be subject to the legal effects of automated processing or profiling
- Judicial review. In the event that Kibo Technology refuses your request under rights of access, we will provide you with a reason as to why. And you have the right to complain.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

8. Complaints

If for any reason you wish to make a complaint about how Kibo Technology (or any of our third parties described in 3.4 above) processes your personal data, or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and the Data Protection Officer of Kibo Technology.

Below are the details for each of these contacts:

	Supervisory Authority	**Data Protection Officer (DPO)**
Contact Name:	National Data Protection Commission	Kibo Data Protection Officer
Address:	No 12 Clement Isong Street, Asokoro, Abuja, Nigeria	3 Port Harcourt Crescent, Garki, Area II, AMAC, FCT
Email:	nfo@ndpc.gov.ng	privacymanager@kibosport.com
Telephone:	+234 (0) 916 061 5551	+234-710 257 6707

9. Privacy statement

For more information on how we use your personal data and why, please visit: https://oss-prod.kibosport.com/kibo/KIBO%27s%20Privacy.pdf

10. Online Privacy Statement

Personal Data

Under the EU's General Data Protection Regulation (GDPR) and the Nigeria Data Protection Act (NDPA) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person."

How We Use Your Information

This privacy notice tells you how we, Kibo Technology, will collect and use your personal data for relationship management, profiling, business analytics/development, communication, registration, subscription, cookies, and all-round efficient service delivery.

Why Does Kibo Technology Need to Collect and Store Personal Data?

We need to collect your personal data in order for us to provide you with our services as mentioned in clause 3.3 above. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose(s) only, and will in no way invade your privacy. If there is a need to use your personal data for marketing purpose, Kibo Technology will ensure to seek additional consent from you

Will Kibo Technology Share My Personal Data with Anyone Else?

Kibo Technology may pass your personal data to third-party service providers contracted by us. Any third parties that we may share your personal data with is under an obligation to secure your details, and use them only to fulfil the service for which they were contracted. When they no longer need your details to fulfil this service, the data will be disposed in line with the Kibo Technology's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are required to do otherwise, legally.

How Will Kibo Technology Use the Personal Data It Collects About Me?

We will process (collect, use and store) the information you provide in a manner that complies with the EU's General Data Protection Regulation (GDPR) and the Nigeria Data Protection Act (NDPA). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Kibo Technology is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. The retention period for certain kinds of personal data may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will the Kibo Technology contact me?

We do not intend to be intrusive, and we will not ask irrelevant or unnecessary questions. Moreover, we will subject the information you provide to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I Find Out the Personal Data That Kibo Technology Holds About Me?

Kibo Technology, at your request, can confirm what information we hold about you and how it is processed. If we do hold your personal data, you have the right to request the following information:

- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- Information about interests, if the processing is based on the legitimate interests of Kibo Technology or a third party.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- Information about how we intend to securely transfer the personal data to a third party or international organisation. The Attorney General of the Federation will approve sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if you didn't provide it directly.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What Forms of ID Will I Need to Provide in Order to Access This?

Kibo Technology accepts the following (but not limited to) forms of ID when information on your personal data is requested.

	Contact details of the Data Protection Officer:
Contact Name:	Kibo Data Protection Officer
Address:	3 Port Harcourt Crescent, Garki, Area II, AMAC, FCT
Email:	privacymanager@kibosport.com
Telephone:	+234-710 257 6707