

Privacy Policy

This Privacy Policy (“Policy”) constitutes GatePass’ commitment to your privacy on our platform. This Policy also forms a part of GatePass’ holistic Terms of Use which you can access [here](#).

About Us

GatePass is a community management solution provider that offers a cloud-based solution deployed on mobile which helps communities manage their visitors, communications, payments and emergencies in a seamless manner.

About this Privacy Policy

This Policy describes your privacy rights regarding GatePass’s (“we”, “us” or “our”) collection, use, storage, sharing and protection of your personal information. It applies to the GatePass website and all applications, services and tools regardless of how you access or use them.

If you are provided with a username, identification code, password or any other piece of information as part of our security measures, you must treat such information as confidential, and you must not disclose it to any third party. We reserve the right to disable any user identification code or password, whether chosen by you or allocated by us, at any time, if in our opinion you have failed to comply with any of the provisions of this Policy. If you know or suspect that anyone other than you know your security details, you must promptly notify us at hello@gatepass.io.

Consent

You accept this Policy when you sign up for access, or use our products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services (collectively “GatePass Services”). This Policy governs the use of GatePass Services by our users unless otherwise agreed through written contract. By using GatePass Services in any manner, you indicate to us that you have read and accept our Policy and consent to the data practices described in this Policy. If you do not accept this Policy and/or do not meet and/or comply with the provisions set forth herein, then you may not use GatePass’ Services.

Your Choices and Privacy Rights

- A. Your right to access the information we hold about you: You have the following rights in connection with our processing of your personal data. If you wish to exercise one or more of these rights, please contact us at hello@gatepass.io. You may request access to the personal data we hold about you. Our file of your information will usually be made available to you within 30 days, although occasionally we may not be able to give you access to all the personal data we hold about you. For example, we may not be able to give you access if the information we hold includes both your

personal data and the personal data of others and disclosing their information to you would adversely affect their rights. Please note that if you request a copy of your data using electronic means (such as email), then we will provide a copy of your information in electronic form unless you ask us to do otherwise.

- B. Your right to have your information corrected: You have the right to have incomplete or inaccurate personal information that we process about you rectified. Note that you can always make certain adjustments to certain personal information directly through your online account.
- C. Your right to have your information deleted: You have the right to request that we delete personal information that we process about you. This right applies only in certain circumstances. For example, we are not obligated to delete your data where we need to retain it in order to comply with our legal obligations or to establish, exercise or defend legal claims or inaccurate personal information that we process about you rectified. Note that you can always make certain adjustments to certain personal information directly through your online account.
- D. Your right to object to us processing your personal data: Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or in defence of a legal claim.
- E. Your right to withdraw consent to processing: If you have consented to us processing your personal data for a particular purpose, you have the right to withdraw your consent at any time, free of charge, by contacting us at hello@gatepass.io. This includes cases where you wish to opt out from marketing messages that you receive from us (including marketing messages that we send on behalf of third-party organizations). You can unsubscribe from marketing communications at any time by following the instructions in any individual message. If you withdraw your consent to processing, we may still contact you in connection with your account, relationship, activities, transactions and communications with us.
- F. Your right to have an electronic copy of your personal data transmitted: Where we hold personal data about you with your consent or for the performance of a contract with you, you also have the right to ask us to provide you with the personal data we hold about you in a structured, commonly used and machine-readable format and, where technically feasible, to transmit that personal data to another organization.
- G. Your right to restrict processing of your data: You have the right to restrict our processing of your personal information where you believe such data to be inaccurate, our processing is unlawful or that we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.

- H. Your right to lodge a complaint with the local data protection authority: You have the right to lodge a complaint with the local data protection authority (which is the National Information Technology Development Agency (NITDA)) if you believe that we have not complied with applicable data protection laws.

Your Personal Information We Collect

When you use GatePass Services, you may provide us with two main types of information: (1) personally identifiable information that you knowingly choose to disclose, which is collected on an individual basis, and (2) general user information that does not contain personally identifiable information, which is collected on an aggregate basis as you browse and use GatePass' Services.

The personally identifiable information you provide us may include but is not limited to (i) contact information (including name, telephone number, email and address); (ii) financial information (such as credit card number, expiration date, verification number and billing address); (iii) username and password (specifically chosen by you); (iv) location information and (v) preferences and behavior (such as record of events, bulletin board posts, comments, areas of interests). Information gotten through survey responses, telephone conversation, customer enquiries and other means may also be used by us.

Once you register, you have opted in to receive electronic communications from us. GatePass and/or your property management may also provide you with the opportunity to participate in surveys through our services. If you participate, we will request certain personally identifiable information. Participation in surveys is completely voluntary and you therefore have a choice whether to disclose such information.

We also collect information sent to us by your computer, mobile phone or other electronic access device. The automatically collected information includes but is not limited to data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, and standard web log data. We may also use information provided by third parties like social media sites. Information about you provided by other sites are not controlled by GatePass and we are therefore not liable for how they use it.

What We Do with Your Personal Information

The purpose of our collecting your personal information is to give you an efficient, enjoyable and secure customer experience. We may use your information to:

- a) verify your identity;
- b) provide GatePass Services and support;
- c) improve the GatePass Services by implementing aggregate customer preferences;
- d) measure the performance of the GatePass Services and improve content, technology and layout;
- e) detect, prevent or remediate violations of policies or applicable user agreements;
- f) manage and protect our information technology infrastructure;
- g) perform analytics and conduct research;

- h) fulfill requests sent through our Services;
- i) contact you at any time through your provided telephone number, email address or other contact details; and/or
- j) poll your opinions through surveys or questionnaires, notify you of new products, discounts, promotions, or as otherwise necessary to service your account.

We may retrieve additional Personal Information about you from third parties and other identification/verification services such as your financial Institution, payment processor and verification services. We will not share or disclose your Personal Information with a third party without your consent.

Information That We Collect from Website Visitors

We do not collect your Personal Information when you visit the website. However, in order to enable us monitor and improve our website and services we may collect non-personally identifiable information. We will not share or disclose this information with third parties except as a necessary part of providing the GatePass Services. We may use the information to target advertisements to you.

Cookies

We use cookies and web log files to track website usage and trend, to identify you as a user and make your user experience easier, customize our services, content and advertising and help you ensure that your account security is not compromised. We also use it to promote trust and safety on our website. Cookies are small text data file that resides on your computer, mobile phone or other device and allows our servers to remember your account log-in information when you visit our website, IP addresses, date and time of visits, monitor web traffic and prevent fraudulent activities. If your browser or browser add-on permits, you have the choice to disable cookies on our website, however this may impact your ability to use our website.

How We Protect Your Personal Information

We store and process your personal information on our computers in Nigeria, Africa and elsewhere in the world where our facilities are located. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls.

We are therefore constantly working hard to secure your personal information from unauthorized access to and/or unauthorized alteration, disclosure and/or destruction of information we hold. We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.

Because the internet is not a completely secure environment, we cannot warrant the security of any information you transmit to us and/or guarantee that information on the GatePass Services may not be

accessed, disclosed, altered and/or destroyed by breach of any of our physical, technical and/or managerial safeguards.

Please do your part to help us. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and us, at all times. Please limit your access to your computer and/or mobile device and browser by signing off after you have finished accessing your account. We are not responsible for the functionality, privacy and/or security measures of any other organization.

How We Share Your Information

We may share your personally identifiable information as well as information from tools like cookies, log files, and device identifiers and location data (such as usage data, referring/exit pages and URLs, platform types, number of clicks, etc.), with property management, employees, contractors, agents and organizations that help us provide the Services to you ("Service Providers"). Our Service Providers will be given access to your information as is reasonably necessary to provide the GatePass Services.

We take the privacy of our users very seriously, and we do not sell, rent, and/or otherwise provide your personally identifiable information to third parties for marketing purposes. We will not share your personally identifiable information in ways unrelated to those described in this Policy without providing you with an opportunity to opt out of such use and/or otherwise prohibit such unrelated use.

As part of the GatePass Services, we may facilitate the sharing of information between building staff and/or residents. As part of the property-related communications, you may obtain another resident's email address, unit number, and/or other information. You have a limited license to use this information only for GatePass related communications and/or for its facilitated transactions. We have not granted you a license to use the information for unsolicited commercial messages and/or unauthorized transactions.

GatePass' disclosure of your data will therefore be as contained in this Policy or in the following circumstances: (i) to investigate and defend GatePass users against any third party claims and/or allegations and/or otherwise to protect GatePass from liability, (ii) to investigate, prevent and/or take action regarding suspected and/or actual illegal activities, (iii) to assist government enforcement agencies, respond to a legal process and/or comply with the law, (iv) to exercise or protect the rights, property and/or personal safety of the users of the Services and/or (v) to protect the security and/or integrity of the GatePass Services.

The Data That We Retain

We will retain your information for as long as your account is active or as needed to provide you with our services, comply with our legal and statutory obligations or verify your information with a financial institution.

Security

To prevent unauthorized access to your information, we have implemented strong controls and security safeguards at the technical and operational levels. This site uses Secure Sockets Layer/Transport Layer Security (SSL/TLS) to ensure secure transmission of your personal data. You should see the padlock symbol in your URL address bar once you are successfully logged into the platform. The URL address will also start with https:// depicting a secure webpage. SSL applies encryption between two points such as your PC and the connecting server. Any data transmitted during the session will be encrypted before transmission and decrypted at the receiving end. This is to ensure that data cannot be read during transmission.

Links to Other Websites

Certain transaction processing channels may require links to other websites. Please note that GatePass is not responsible and has no control over websites outside its domain. We do not monitor or review the content of other party's websites which are linked from this website. Opinions expressed or materials appearing on such websites are not necessarily shared or endorsed by us, and GatePass should not be regarded as the publisher of such opinions or materials. Please be aware that we are not responsible for the privacy practices, or content of these sites. We encourage our users to be aware of when they leave our site and to read the privacy statements of these sites. You should evaluate the security and trustworthiness of any other site connected to this site or accessed through this site yourself, before disclosing any personal information to them. GatePass will not accept any responsibility for any loss or damage in whatever manner, howsoever caused, resulting from your disclosure to third parties of personal information.

Updates, Modifications & Amendments

We may need to update, modify or amend this Policy as our technology evolves or subject to regulatory requirements. We reserve the right to make changes to this Policy at any time by giving notice to Users on this page. We advise that you check this page often, referring to the date of the last modification on the page. If a User objects to any of the changes to this Policy, the User must cease using this website, terminate his/her account in the event that an account has been created and desist from using any of GatePass's Services.

Age Restriction

GatePass does not knowingly collect personally identifiable information from children under the age of thirteen (13). If we learn that we have collected personal information from a child under age thirteen (13), we will delete that information as quickly as possible. If as a parent or guardian you believe that your child or ward under the age of thirteen (13) may have provided us personal information, please contact us at hello@gatepass.io. By using our website and services, you represent that you are at least 18years of age.

Compliance with Local and International Regulatory Best Practices

We confirm that we comply with the Nigerian Data Protection Regulation on data collection, transmission, usage and protection. We also, for best practices, adopt pertinent best practices per the General Data Protection Regulation (2016/679) (the GDPR) to the extent that they do not conflict with Nigerian data protection regulations and laws.

Governing Law

This Privacy Policy shall be interpreted and governed by the laws currently in force in the Federal Republic of Nigeria.