

| Title | Privacy Policy | |
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| Revision 0.2 | Reviewed By: Cyril Macauley | 15 th /04/2024 |
| Effective Date | Approved By: Emmanuel Tondoneh | 1 st /05/2024 |

1. Background.

- 1.1. Metro Cable (SL) Limited ("**Vult**") values the privacy of our users. Vult uses individual personal data to provide and improve the Service. Therefore, this privacy policy explains in detail how we use and protect the information we collect when individuals visit our website or use mobile application, as well as our media channel/other applications.
- 1.2. Individuals must refrain from visiting our site or use our application if the terms outlined below are not satisfactory to the individual. Vult reserve the right at their sole discretion to change this policy at any time and will list these changes in the updates section of the policy.
- 1.3. By reading this policy and visiting our site, You agree that You understand that customers will not be personally notified when this policy changes. Therefore, we advise our customers to frequently review our privacy policy so that they remain aware of its updates. By visiting our site, you accept that the posted policy and all its changes apply to your interaction with Vult.

2. Interpretation and Definitions Interpretation

"**Account**" means a unique account created for the You/Individual to access our Service or parts of Vult Services.

"**Cards**" means either virtual or physical prepaid cards obtained from our platform (app or merchant location)

"**Business**" refers to Metro Cable (SL) Limited (trading as Vult) as the legal entity that collects Consumers' personal information and determines the purposes and means of the processing of Consumers' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of consumers' personal information, within Sierra Leone.

"**Country**" refers to the Republic of Sierra Leone.

"**Consumer**" means the definition as set out in the Consumer Protection Act 2020 (Sierra Leone).

"Cookies" are small files that are placed on the individual's device, or any other device by a website, containing the details of the individual browsing history on that website among its many uses.

"Device" means any device that can access the Service such as a computer, a cell phone, or a digital tablet.

"Personal Data" means any information that relates to an identified or identifiable individual, such as the individual's, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity or information capable of being associated with, or could reasonably be linked, directly or indirectly, with the individual.

"Service" means the product offered by Vult which customers subscribe to details of which is provided on the website.

"Usage Data" refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

"Website" refers to Vult, accessible from www.vultme.io

"You Individual" means the individual accessing or using the Service, or Vult, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

3. Usage Data

3.1. Information collected by Vult which includes Your personal information may be collected in various ways.

3.2. Usage Data is collected automatically when using the Service. Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

3.3. When You access the Service by or through a mobile device, Vult may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data. We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

3.4. In addition to the above additional information include personal identifying

information like your name, address, email, phone number, age, gender, and other personal data.

- 3.5. Vult may also collect financial information related to the Services including your payment method and identifying payment information. Vult rarely store financial information collected on our site for transaction purposes. That information gets sent directly to our payment processor.
- 3.6. Vult also uses Cookies and similar tracking technologies to track the activity on our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service. The technologies We use may include Cookies or browser cookies.
- 3.7. For the purposes of our operations our website and mobile application uses Your information for the following purposes,
 - 3.7.1. manage your account,
 - 3.7.2. tailor advertisement to you,
 - 3.7.3. deliver promotion to you,
 - 3.7.4. email you account information,
 - 3.7.5. notify u of update,
 - 3.7.6. offer new product,
 - 3.7.7. allow you to provide customer feedback,
 - 3.7.8. resolve account dispute,
 - 3.7.9. respond to questions relating to your account,
 - 3.7.10. resolve disputes, etc.
- 3.8. Vult may also use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.
- 3.9. We may share Your personal information in the following situations, with service providers, Vult may share Your personal information with other service provider to monitor and analyze the use of our Service, for payment processing, to contact You.
- 3.10. Vult may also share your information with its affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any other subsidiaries, joint venture partners or other companies that Vult control or that are under common control with us.
- 3.11. Vult may share Your information with our business partners to offer You certain products, services, or promotions.
- 3.12. Vult may also share Your information with other users. When You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed

outside.

4. Information Disclosure Normally,

4.1. Your information stays on our site. We have listed the situations that may require us to share the information we collect from you,

- 4.1.1. when required by law, such as for fraud protection.
- 4.1.2. with our third-party providers for payment processing and hosting
- 4.1.3. with your consent for marketing purposes
- 4.1.4. when you post comments on the site
- 4.1.5. to our advertisers, affiliates, and partners
- 4.1.6. if this site goes bankrupt and data must be transferred

4.2. Vult may be required to disclose Your personal data by statutory bodies or government authorities. If required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency etc). Vult may disclose Your Personal Data in the good faith belief that such action is necessary to:

- 4.2.1. comply with a legal obligation
- 4.2.2. protect and defend the rights or property of Vult
- 4.2.3. prevent or investigate possible wrongdoing in connection with the Service
- 4.2.4. protect the personal safety of Users of the Service or the public
- 4.2.5. protect against legal liability Security of Your Personal Data.

5. Cookies, Trackers, and Online Advertisement.

5.1. Vult may use cookies, trackers, web beacons, and other technology to customize our [website/mobile application] to improve your experience.

5.2. We may customize the site using this information. These trackers do not have access to your personal information and can be removed from your browser options. In addition, third-party software provides ads for our site for marketing campaigns. These programs have access to tracking technology to optimize your ad experience.

6. Information Security

6.1. We take technical and administrative precautions to protect your data, but we cannot guarantee its safety against all types of fraud or misuse.

6.2. If you provide personal information, we cannot verify its total security against all types of interception.

6.3. Do-Not-Track. Some browsers offer Do-Not-Track settings to prevent any information from being distributed. Since these settings have not been legally established as standard practice, we [do/do not acknowledge] these

settings.

- 6.4. At any time, you may opt to review or change your account settings, including contact information.
- 6.5. If you wish to delete your account, you may do so to remove most of your information, however, some identifying information will be retained to prevent fraud.
- 6.6. You may also opt-out of emails and other correspondences from our site at any time.
- 6.7. Contact Us If you have questions or concerns about this privacy policy, please feel free to contact us at, Metro Cable (SL) Limited, 37A Wilkinson Road Freetown Sierra Leone or via email on **support@vultme.io** and telephone **+232 33 399 399**.