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## **Buupass Website Privacy Policy**

### **1. About our Terms**

- 1.1 This Website Privacy Policy explains what information we collect from you when you use our Site, how we keep and use that information, and how safeguard your privacy.
- 1.2 References in this Website Privacy Policy to the Site means [www.buupass.com](http://www.buupass.com) and all associated web pages including USSD platforms.
- 1.3 You should read this Privacy Policy carefully before using the Site.
- 1.4 By accessing or using the Site or otherwise indicating your consent, you agree to be bound by these terms and the documents referred to in them.
- 1.5 If you do not agree with or accept any of the terms of this Privacy Policy, you should stop using the Site immediately.
- 1.6 If you have any questions about the Site, please contact us by:
  - 1.6.1 e-mail [info@buupass.com](mailto:info@buupass.com). Email will be responded to Monday to Friday: 9:00 a.m. to 5:00 p.m. Please email us again if you do not receive after one week. You can also reach us on the telephone number below, or
  - 1.6.2 telephone +254 715 763 362. Phone calls will be answered Monday to Friday: 9:00 a.m. to 5:00 p.m.
- 1.7 Your use of the Site means that you must also comply with our Acceptable Use Policy and our website terms of use, and all other terms applicable.
- 1.8 Throughout our website we may link to other websites owned and operated by certain trusted third parties. These other third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third party websites, please consult their privacy policies as appropriate.

### **2. Our collection and use of your personal information**

- 2.1 We collect personal information about you when you access our website, register with us, contact us, send us feedback, purchase products or services via our website, post material to our website and complete customer surveys or participate in competitions via our website, SMS campaigns, phone calls or interview surveys done by any of our staff, agents or consultants.
- 2.2 We collect this personal information from you either directly, such as when you register with us, contact us or purchase products or services via our website or

indirectly, such as your browsing activity while on our website (see 'Cookies' below).

2.3 The personal information we collect about you depends on the particular activities carried out through our website. Such information includes:

- a) your name, address and contact details
- b) date of birth
- c) bank account and payment details
- d) details of any feedback you give us by phone, email, post or via social media
- e) information about the services we provide to you
- f) your account details, such as username, login details
- g) your mobile telephone number and email address
- h) your identity card or passport number

2.4 We use this personal information to:

- a) verify your identity
- b) provide goods and services to you
- c) customise our website and its content to your particular preferences
- d) notify you of any changes to our website or to our services that may affect you
- e) improve our services

2.5 This website is not intended for use by children under the age of 18 and we do not knowingly collect or use personal information relating to children.

### **3. Our legal basis for processing your personal information**

3.1 When we use your personal information, we are required to have a legal basis for doing so. There are various different legal bases upon which we may rely, depending on what personal information we process and why.

3.2 The legal bases we may rely on include:

- a) **consent:** where you have given us clear consent for us to process your personal information for a specific purpose

- b) **contract:** where our use of your personal information is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract
- c) **legal obligation:** where our use of your personal information is necessary for us to comply with the law (not including contractual obligations)
- d) **legitimate interests:** where our use of your personal information is necessary for our legitimate interests or the legitimate interests of a third party (unless there is a good reason to protect your personal information which overrides our legitimate interests)

#### 4. Further information—the personal information we collect, when and how we use it

4.1 For further details on when we collect personal information, what we collect as well as how we use it, please read the following sections:

When information is collected	What information we ask for	How and why we use your information
When you access any of our platform	Phone number	We ask for this: — To send you drip SMS asking if you experienced any technical difficulty in using our services
When you visit any of our social media channels	Personal details from cookies and information available on your social media pages	We ask for this: — to send you follow-up message to assist you in using our platforms — to communicate Improve the quality of our services
When either our staff, agents or consultants contact you on phone, in person or through SMS to discuss our services	Other details might depend on the nature of discussion or survey and many include, but not limited to the following information:  - Name - Phone number - ID/Passport Number - Nationality	We ask for this: — to improve the way we market to you — to communicate  Improve the quality of our services
When you book a ticket with us	Contact details: Name Phone number ID/Passport Number Personal Information: Nationality	We ask for this: — to book for you a ticket — to communicate with you about your ticket — to contact in case of changes affecting your intended travel  We rely on your consent as the lawful basis for collecting and using your personal information.

## **5. Who we share your personal information with**

- 5.1 We routinely share personal information and contact details with the transportation company you have chosen to travel.
- 5.2 This data sharing enables us to book your travel ticket with the transportation company.
- 5.3 We will share personal information with law enforcement or other authorities if required by applicable law or upon receiving a court order.
- 5.4 We will not share your personal information with any other third party.

## **6. Whether information has to be provided by you, and if so why**

We require you to provide personal data, for example name, address, phone number etc. to enable us provide to you the ticket booking service. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

## **7. Cookies and similar technologies**

- 7.1 A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies and other similar tracking technologies such as on our website and USSD platforms. These help us recognize you and your device and store some information about your preferences or past actions.
- 7.2 For further information on our use of cookies, please see at [www.buupass.com](http://www.buupass.com).

## **8. Marketing**

- 8.1 We would like to send you information about our products and services, competitions and special offers, which may be of interest to you. Where we have your consent or it is in our legitimate interests to do so, we may do this by post, email, telephone, text message (SMS) or automated call.
- 8.2 You may ask us to stop sending marketing information at any time by:
  - a) contacting us at [info@buupass.com](mailto:info@buupass.com)
  - b) using the 'unsubscribe' link in emails or 'STOP' number in texts
- 8.3 It may take up to 14 working days for this to take place. Please contact us on email ([info@buupass.com](mailto:info@buupass.com)) or phone (+254 715 763 362) if we have not implemented your request to unsubscribe after fourteen (14) working days from the day you submitted your request to us. We will answer your emails and phone calls between Monday to Friday: 9:00 a.m. to 5:00 p.m.

For more information on your rights in relation to marketing, see 'your rights' in clause 9 below.

## **9. Your rights**

9.1 Under this PRIVACY NOTICE and the Privacy and Data Protection Policy 2018 of Kenya, you have a number of important rights free of charge. In summary, those include rights to:

- a) access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- b) require us to correct any mistakes in your information which we hold
- c) require the erasure of personal information concerning you in certain situations
- d) receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- e) object at any time to processing of personal information concerning you for direct marketing
- f) object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- g) object in certain other situations to our continued processing of your personal information
- h) otherwise restrict our processing of your personal information in certain circumstances

11.2 If you would like to exercise any of those rights, please:

- a) email, call or write to us,
- b) let us have enough information to identify you,
- c) let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- d) let us know the information to which your request relates.

## **10. Keeping your personal information secure**

10.1 We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need

to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

- 10.2 We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **11. How to complain**

We hope that we can resolve any query or concern you raise about our use of your information. In case you experience any problem using our Site please send an email to [info@buupass.com](mailto:info@buupass.com), write to 7<sup>th</sup> Floor, Pinetree Plaza, Ngong Road, Kamburu Drive, Nairobi-Kenya or call +254 715 763 362.

## **12. Changes to this website privacy policy**

- 12.1 This website privacy policy was published on 1<sup>st</sup> January, 2019.
- 12.2 We may change this website privacy policy from time to time, when we do we will inform you by posting the new policy on our website and provide a date for when the policy will start to apply to your use of the Site.

## **13. How to contact us**

- 13.1 Please contact us, if you have any questions about this privacy notice or the information we hold about you.
- 13.2 If you wish to contact us, please send an email to [info@buupass.com](mailto:info@buupass.com), write to 7<sup>th</sup> Floor, Pinetree Plaza, Ngong Road, Kamburu Drive, Nairobi-Kenya or call +254 715 763 362 .

## **Buupass Cookie Policy**

### **1. About our Terms**

- 1.1 This Cookie Policy explains what tools we use to facilitate your use this Site including identifying you and collecting information.
- 1.2 References in this Cookie Policy to the Site means [www.buupass.com](http://www.buupass.com) and all associated web pages.
- 1.3 You should read this Cookie Policy carefully before using the Site.
- 1.4 By accessing or using the Site or otherwise indicating your consent, you agree to be bound by these terms and the documents referred to in them.
- 1.5 If you do not agree with or accept any of the terms of this Cookie Policy, you should stop using the Site immediately.
- 1.6 If you have any questions about the Site, please contact us by:
  - 1.6.1 e-mail [info@buupass.com](mailto:info@buupass.com). Email will be responded to between Monday to Friday: 9:00 a.m. to 5:00 p.m. Please email us again if you do not receive after one week. You can also reach us on the telephone number below, or
  - 1.6.2 telephone +254 715 763 362. Phones will be answered between Monday to Friday: 9:00 a.m. to 5:00 p.m.
- 1.7 Your use of the Site means that you must also comply with our Acceptable Use Policy, our website terms of use, and all other policies applicable.
- 1.8 Throughout our website we may link to other websites owned and operated by certain trusted third parties. These other third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to these other third party websites, please consult their privacy policies as appropriate.

### **1. Cookies**

- 1.1 A cookie is a small text file that is placed onto your device, for example, computer, smartphone or other electronic device, when you use our website. We use cookies and other similar tracking technologies on our website. These help us recognize you and your device and store some information about your preferences or past actions.
- 1.2 For example, we may monitor how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider. This information helps us to build a profile of our users.



Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

- 1.3 You can set your browser not to accept cookies. However, some of our website features may not function as a result.

## **2. Our use of cookies**

We use cookies, and other similar tracking technologies, on this website to:

- 3.1 recognize you whenever you visit this website (this speeds up your access to the website as you do not have to log in each time);
- 3.2 obtain information about your preferences and use of our website;
- 3.3 carry out research and statistical analysis to help improve our content and services, and to help us better understand our users' requirements; and
- 3.4 target our marketing and advertising campaigns more effectively by providing interest-based advertisements that are personalized to your interests; and
- 3.5 make your online experience more efficient and enjoyable.

## **4 Types of cookies**

The cookies we place on your device fall into the following categories:

- 4.1 **Session cookies**—these allow our website to link your actions during a particular browser session. These expire each time you close your browser and do not remain on your device afterwards
- 4.2 **Persistent cookies**—these are stored on your device in between browser sessions. These allow your preferences or actions across our website to be remembered. These will remain on your device until they expire, or you delete them from your cache
- 4.3 **Strictly necessary cookies**—these cookies are essential for you to be able to navigate our website and use its features. Without these cookies, the services you have asked for could not be provided
- 4.4 **Performance cookies**—these cookies collect information about how you use our website, eg which pages you go to most often. These cookies do not collect personally identifiable information about you. All information collected by these cookies is aggregated and anonymous, and is only used to improve how our website works
- 4.5 **Functionality cookies**—these cookies allow our website to remember the choices you make (such as your user name, language, last action and search preferences)

and provide enhanced, more personal features. The information collected by these cookies is anonymous and cannot track your browsing activity on other websites

## 5 The cookies we use

The table below provides more information about the cookies we use and why:

	<b>The cookies we use</b>	<b>What they do</b>
1.	Session Cookies	These are used to track the booking data that a user inputs up until the checkout confirmation page. All the Session cookies expire (are cleared) after payment is made or when the browser is closed.
2.	First-Party Cookies by Buupass	They help sites to remember your information and settings when you revisit the platform in the future. They remember your preferences such as menu settings, themes, language selection, and internal bookmarks between sessions.
3.	Third-Party Cookies by external web services who help in identifying User-Behaviour	They collect information to carry out various research into user journey behaviour, demographics. Example of providers are Google (For the Analytics), Facebook (For Facebook analytics) This are web analytics services provided by Google Inc. and Facebook which use the cookies to show us how visitors found and explored our site, and how we can enhance their experience. It provides us with information about the behaviour of our visitors (e.g. how long they stayed on the site, the average number of pages viewed) and tells us how many visitors we have had.

## 6 Consent to use cookies

We will ask for your permission (consent) to place cookies or other similar technologies on your device, except where these are essential for us to provide you with a service that you have requested.

## 7 How to turn off cookies

If you do not want to accept cookies, you can change your browser settings so that cookies are not accepted. If you do this, please be aware that you may lose some of the functionality of this website.

## **8 Changes to this policy**

- 8.1 This website cookie policy was published on 1st January, 2019.
- 8.2 We may change this website cookie policy from time to time, when we do we will inform you via email ([info@buupass.com](mailto:info@buupass.com)) or website ([www.buupass.com](http://www.buupass.com)).

## **9 How to contact us**

- 9.1 Please contact us if you have any questions about this cookie policy or the information we hold about you
- 9.2 If you wish to contact us, please send an email to [info@buupass.com](mailto:info@buupass.com), write to 7<sup>th</sup> Floor, Pinetree Plaza, Ngong Road, Kamburu Drive, Nairobi-Kenya or call +254 715 763 362.