



1. INTRODUCTION

BuuPass is a reputable company specializing in collaborating with transport operators to deliver seamless digital solutions that enhance the convenience and reliability of commuter movement which it does by supplying digital services that allow for the booking of transportation including buses, flights and trains by individuals and corporates.

This Privacy Policy governs the relationship between you; Our Client and BuuPass in terms of the data that we collect during your engagement with us, how we use and store the said data, the legal premise of collecting the said data and the rights both parties have in regards to the said data.

BuuPass will at all times have and put in place all necessary organizational and technical measures to ensure that your data is protected and shall respect and uphold your Data Protection Rights.

In case of any questions, queries and/or requests, feel free to contact our Data Protection officer whose details are under Clause 15

2. About our Terms

This Policy is issued by BuuPass (hereinafter referred to as “BuuPass”, “we”, “us” and “our”) and is addressed to individuals outside our organization with whom we interact and/or transact with, including customers, visitors to our Sites, users of our Apps, other users of our products or services, and visitors to our premises (“you”).

This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Information, or changes in applicable law.

As such, we encourage and advise that you read this Policy carefully each time so as to be cognizant of any changes that may have been effected.

Be advised that your use of our Platform means acceptance of this Privacy Policy and the terms herein.

3. Collection and Use of Personal Data

- 3.1 Personal Data is defined as any information that identifies a natural person which means that it is information that can be used to identify you and this data includes information such as your name and contact details, your travel arrangements and purchase history. This may also include information about how you use our website, mobile applications and relevant platforms.
- 3.2 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.
- 3.3 We obtain Personal Information when that information is made available to us by you (e.g., where you contact us via email or telephone, or by any other means, when you create an online profile with us, or when you submit a job application).
- 3.4 We collect or obtain Personal Information in the ordinary course of our relationship with which we obtain when you use our services which includes booking your travels with us through our platforms and/or when you interact with us through our communication channels



- 3.5 We collect or obtain Personal Information that you choose to make public, including via social media specifically when you make a public post about us
- 3.6 We collect or obtain Personal Information when you visit any of our Sites or use any features or resources available on or through a Site and when you create an account/register with us on any of our Platforms
- 3.7 When you interact with any third-party content or advertising on a Site or in an App (including third party plugins and cookies) we receive Personal Information from the relevant third-party provider of that content or advertising.
- 3.8 We collect or obtain Personal Information from third parties who provide it to us (e.g., companies contracted by us to provide services to you, Travel Agencies, Corporate Employers)

4. Data that we Process

- 4.1 As stipulated under Clause 3 above, we interact with your data on numerous occasions. As such, it is important to clearly outlining, for your understanding the actual data that we process. We process
 - 4.1.1 Your name
 - 4.1.2 Gender, age, passport and/ National Identity Card details
 - 4.1.3 Communication details which are your telephone number and email
 - 4.1.4 records of purchases and prices including the travel itinerary itself details of any additional assistance you require, and other information related to your travels made available to us during your engagement with us
 - 4.1.5 Information relating to our Sites and Platforms including device type, IP address and login information
 - 4.1.6 Details of your employer where a booking is made by you or on your behalf by your employer in your capacity as an employee
 - 4.1.7 Your interaction with our content on our Platforms including social media
 - 4.1.8 Feedback and/or opinions you may share with us on any of our platforms including your public posts, surveys and direct feedback to our customer care team

5. Processing of Sensitive Personal Data

- 5.1 Sensitive Personal Data means data revealing the natural person's race, health status, ethnic social origin, conscience, belief, genetic data, biometric data, property details, marital status, family details including names of the person's children, parents, spouse or spouses, sex or the sexual orientation.
- 5.2 BuuPass may collect and Process Sensitive Personal Information in the ordinary course of our business. However, this is extremely limited and rare and only applies in instances where:-
 - 5.2.1 you make a specific request for medical assistance through us which we then communicate to the relevant Service Provider
 - 5.2.2 you have sought clearance to fly with a medical condition which we need to communicate to the relevant Service Provider
 - 5.2.3 you have chosen to provide such information to us or it has been passed to us by a third party such as the travel agent or employer
 - 5.2.4 you have requested services which may imply or suggest your religion, health or other information
- 5.3 Processing of your Sensitive Personal Data is based on the following legal and legitimate reasons and criteria
 - 5.3.1 where the Processing is required or permitted by applicable law (e.g., to comply with our diversity reporting obligations);



- 5.3.2 where the Processing is necessary for the establishment, exercise or defence of legal rights;
 - 5.3.3 where we have, in accordance with applicable law, obtained your prior, express consent prior to Processing your Sensitive Personal Information (voluntary processing)
- 5.4 Be advised that should you choose to provide Sensitive Personal Data, the same should only be done with your express consent or the express consent of the person to whom the data applied and/or belongs and you must ensure a valid legal basis applies to the Processing of those Sensitive Personal Information.

6. Cookies

6.1 Cookies are small text files that are placed on your computer, mobile phone or tablet by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to website owners.

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

- 6.2.1 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)
- 6.2.2 obtain information about your preferences and use of our website;
- 6.2.3 carry out research and statistical analysis to help improve our content and
- 6.2.4 services, and to help us better understand our users' requirements; and
- 6.2.5 target our marketing and advertising campaigns more effectively by providing interest-based advertisements that are personalized to your interests; and
- 6.2.6 make your online experience more efficient and enjoyable.

6.3 We use the following cookies:-

6.3.1 Strictly Necessary Cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. You can set your browser to block or alert you about these cookies, but some parts of the site will not work. These cookies, for the avoidance of doubt do not store any personally identifiable information.

6.3.2 Functional Cookies

These cookies enable the website to provide enhanced functionality and personalization. If you do not allow these cookies then some or all of these services may not function properly.

6.3.3 Performance Cookies

These cookies allow us to measure and improve the performance of our Platforms. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site, and will not be able to monitor its performance.

6.3.4 Targeting Cookies

These cookies may be set through our site by our advertising partners. They collect information to carry out various research into user journey behavior, demographics and to show us how visitors found and explored our site which then allows us to tailor marketing messages and personalize your user journey with us. If you do not allow these cookies, you will experience less targeted advertising.



6.4 Please note that we only make use of the cookies once we have your consent to do so which consent or lack thereof is issued through the cookie pop up or preference center. As such, you may change your preferences, give, withdraw or modify consent at any given time by disabling the said cookies (except for strictly necessary cookies that are required for the proper functioning of the site):

7. Disclosure of Personal Data to Third Parties

7.1 BuuPass will disclose Personal Information for legitimate business purposes and the purpose of completing and fulfilling our contractual obligations in line with the provisions of applicable laws. Specifically we may share your information with:

7.1.1 you and, where appropriate, your appointed and communicated representatives

7.1.2 law enforcement agencies including fraud prevention and anti-money laundering agencies

7.1.3 Regulatory authorities, courts, or other statutory authorities in response to a demand issued with the appropriate lawful mandate and where the form and scope of the demand is compliant with the law.

7.1.4 our subsidiaries and the Specific Service Providers so as to ensure a completion of the booking process and seamless delivery of our services.

7.1.5 survey agencies that conduct surveys on behalf of BuuPass.

7.1.6 Where applicable with Payment merchants for the purpose of verifying the transactions

7.2 Please note that we may engage third party processors in order. In such cases, the Processor will be subject to binding contractual obligations (through a detailed data sharing agreement), which expressly indicates that they are to:

7.2.1 only Process the Personal Information in accordance with our prior written instructions

7.2.2 use measures to protect the confidentiality and security of the Personal Information; together with any additional requirements under applicable law.

8. Marketing Messages

8.1 By procuring our services, you consent to receiving marketing messages from us from time to time


8.2 At any given time, you may adjust your marketing preferences by opting out by using the USSD code at the bottom of all our SMS communications or by writing to our data protection officer vide the email provided under Clause 15 below.

8.3 You may unsubscribe from our promotional email list at any time by simply clicking on the unsubscribe link included in every promotional email we send.

8.4 After unsubscribing from the marketing/promotional messages, we will not send you further promotional emails, but we will continue to contact you to the extent necessary for the purposes of fulfilling our contractual obligations to you

9. Legal Basis For Processing Your Data

As stated above, we collect your personal data, which we process for specific and limited purposes as enumerated below:-

ACTIVITY 	REASON FOR COLLECTING AND PROCESSING
<p>Accessing our Sites, Apps, products, or services.</p> <p>This information collected is name, address, phone number, identity document type and number, date of birth, email address, age, and gender across the board</p>	<ul style="list-style-type: none"> • The Processing is necessary to complete the contract between you and us • We have a legitimate interest in carrying out the Processing for the purpose of providing the services required by you • Sending you promotional information • We have obtained your prior consent to the Processing of your information • Send you confirmations of travels and all the information required for you itinerary
<p>We carry out compliance checks in line with our regulatory and compliance and legal obligations</p>	<ul style="list-style-type: none"> • The Processing is necessary for compliance with a legal obligation ; or • The Processing is necessary to complete the contract between you and us • We have a legitimate interest in carrying out the Processing for the purpose of providing the services required by you • Sending you promotional information • We have obtained your prior consent to the Processing of your information except where consent is not required in line with the legal provisions
<p>We collect information that is necessary for our operational requirements</p>	<ul style="list-style-type: none"> • The Processing is necessary to complete the contract between you and us • We have a legitimate interest in carrying out the Processing for the purpose of providing the services required by you • Sending you promotional information • We have obtained your prior consent to the Processing of your information • To communicate any changes to our website
<p>Collecting information necessary for communicating with you and obtaining consent</p>	<ul style="list-style-type: none"> • The Processing is necessary to complete the contract between you and us • We have a legitimate interest in carrying out the Processing for the purpose of providing the services required by you



	<ul style="list-style-type: none"> • Sending you promotional information • We have obtained your prior consent to the Processing of your information • Communicating with you in regards to your travel needs and requirements • Informing you of how to reach us including the modes of opt in and opt out from any of our services
<p>We collect your information for the purpose of maintaining and conducting audits</p>	<ul style="list-style-type: none"> • The Processing is necessary for compliance with legal obligations • We have a legitimate interest in carrying out the Processing for the purpose of managing and maintaining our communications and IT systems and carrying out our audits in regards to our information and accessing the information that we need to retain
<p>We process your information for financial management and compliance</p>	<ul style="list-style-type: none"> • We have obtained your prior consent to the Processing • We have a legitimate interest in carrying out the Processing for the purpose of providing the services required by you • The processing is necessary for compliance with legal obligations • We collect the information to monitor our sales and carry out our financial audits
<p>We collect your information to conduct Surveys</p>	<ul style="list-style-type: none"> • We have obtained your prior consent to the Processing • We have a legitimate interest in carrying out the Processing for the purpose of providing the services required by you • To obtain your views and opinions on the services we provide
<p>We collect security information from you which includes records when you visit our premises and CCTV recordings and credentials when you use our WIFI</p>	<ul style="list-style-type: none"> • We have obtained your prior consent to the Processing • We have a legitimate interest in carrying out the Processing for the purpose of providing the services required by you • The processing is necessary for compliance with legal obligations • To ensure a safety when you interact with our services or visit our premises



<p>We process your information when to carry out Investigations</p>	<ul style="list-style-type: none"> • We have a legitimate interest in carrying out the Processing for the purpose of providing the services required by you • The processing is necessary for compliance with legal obligations • To ensure that we detect, investigate and prevent the occurrence of criminal offences and activities in accordance with all applicable laws
<p>We collect your information for the purpose of Legal proceedings</p>	<ul style="list-style-type: none"> • We have a legitimate interest in carrying out the Processing for the purpose of providing the services required by you • The processing is necessary for compliance with legal obligations • For the establishing of legal rights and defenses
<p>We collect your information for detecting, preventing and investigating fraud.</p>	<ul style="list-style-type: none"> • We have a legitimate interest in carrying out the Processing for the purpose of providing the services required by you • The processing is necessary for compliance with legal obligations
<p>We collect your information for our job recruitment process as well as our engagement with agents and service providers</p>	<ul style="list-style-type: none"> • We have a legitimate interest in carrying out the Processing for the purpose of providing the services required by you • The processing is necessary for compliance with legal obligations • We have obtained your prior consent

10. Profiling

10.1 BuuPass processes the information you provide as well as the interactions you have with our Platforms for the purposes of automated decision making and profiling.

10.2 The purpose of the profiling activities is to:-

10.3.1 Provide Customised discounts where by analysing your purchasing activity and your interests we are then able to determine the most appropriate promotions and discounts to offer you and send you tailor made discounts that may not be made available to other customers

10.3.2 Provide information on available and new routes where by analysing your Previous/current travel travels/itinerary we are able to send promotions around the routes your frequent or prefer and may mean that you receive new product launches, new destinations or similar options that are not available to others



- 10.3.3 Provide information on add on services that are based on your past booking preferences and purchase history. E.g. you only book VIP or first class and as such we then send you offers specific to you

11 **Minors And Persons With Mental And/or Other Disabilities**

- 11.1 BuuPass does not onboard minors, except where you additionally register on their behalf as their parent and/or legal guardian. If you allow a child to use our services, you should be aware that their personal information could be collected as described in this statement
- 11.2 In cases where you are a person who has a mental or other disability, we allow registration by a person duly authorized to act as your guardian or administrator.

12 **Information Retention**

- 12.1 In line with the Data Protection Act and Regulations, we ensure that your data is processed and retained for a minimum period. As such, we retain your personal data for as long as;-
 - 12.1.1 We maintain our ongoing business relationship with you
 - 12.1.2 your Personal Information is necessary in connection with the lawful purposes set out in this Policy e.g for the completion of the contract between you and us and/or for the period indicated under the laws and regulations and we are under a legal obligation to retain your personal information
 - 12.1.3 in cases where a claim has been instituted, during the duration of that claim and six (6) months after the end of the said claim
- 12.2. Please be advised that during the periods indication in clause 12.1.3 above, the processing is limited to storage of, and maintaining the security of, that information, except to the extent that the information needs to be reviewed in connection with any legal claim, or any obligation under applicable law.
- 12.3. Once the periods above have ended, we will either:
 - 12.3.1 permanently delete or destroy the relevant Personal Information
 - 12.3.2 anonymize the relevant Personal Information.

13 **Storage Of Your Personal Data and Data Security**

- 13.1 All information you provide to us is stored in our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential.
- 13.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.



14 Your Legal Rights

- 14.1 Subject to applicable law, you may have the following rights regarding the Processing of your Relevant Personal Information:
- 14.1.1 the right not to provide your Personal Information to us (however, please note that we will be unable to provide you with the full benefit of our services which may then affect our ability to complete the contract of services)
 - 14.1.2 the right to request access to, or copies of, your Relevant Personal Information, together with information regarding the nature, Processing and disclosure of those Relevant Personal Information
 - 14.1.3 the right to request rectification of any inaccuracies in your Relevant Personal Information
 - 14.1.4 the right to request, on legitimate grounds erasure of your Relevant Personal Information; or restriction of Processing of your Relevant Personal Information;
 - 14.1.5 the right to have certain Relevant Personal Information transferred to another Controller
 - 14.1.6 where we Process your Relevant Personal Information on the basis of your consent, the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Information in reliance upon any other available legal bases)
 - 14.1.7 the right to lodge complaints regarding the Processing of your Relevant Personal Information with a Data Protection Authority
- 14.2 If you wish to exercise any of these rights, please contact us in writing to the contact provided under clause 15 below. We may need to verify your identity and request additional information to ensure that we do not disclose personal data to unauthorized persons.
- 14.3 We will respond to legitimate requests within a reasonable time, but complex or multiple requests may take longer, in which case we will notify you and keep you updated.

15 Changes To This Policy

- 15.1 We may update or modify this policy at any time. If we make any changes, you can always access the most recent version of the policy which will be immediately uploaded on the website
- 15.2 **Any changes to this policy will take effect from the date of notification on the Buupass website and Platforms**

How to Contact Us

If you have any questions and/or questions on this policy including the implementation of any of your rights as enumerated under clause 14 above, please contact us by writing to our Data Protection officer

Data Protection Officer
dataprotection@buupass.com



Be advised that in line with the stipulations of this privacy policy, your details are shared with the relevant Specific Service Provider e.g. a bus company, Airline or Train service at which point you become their Client/Customer. As such, it is your responsibility to familiarize yourself with their Privacy Policy and any other relevant policy regarding your personal data.

Other service providers who you may engage with as part of booking your travels through us, such as car rental providers and hotels will be considered separate Controllers of your Personal Information. Check the website or contact the other airline for a copy of the relevant privacy policy.

Last revised on 20th August, 2024