

1 ABOUT MITERA HEALTH

Mitera Health Limited is a wholly-owned Nigerian healthtech company that aims to improve access to healthcare delivery in Africa by deploying pioneering digital technology. Our services, plans and products are designed to form crucial building blocks for accessible healthcare delivery. We aim to promote and provide accessible, efficient and affordable healthcare to all Nigerians and target countries around Africa.

This privacy policy will explain how Mitera Health uses the personal data collected from our customers and related partners when you use our website or subscribe to use any of our products and services.

2 INTRODUCTION

Mitera Health conducts business in a responsible and sustainable manner and ensures customer information is securely collected, processed, and stored based on business requirements. In furtherance of this and compliance with industry regulations, Mitera Health has made appropriate documentation, which includes a privacy policy. Mitera Health, therefore, provides notice about this policy, applicable procedures, and identifies the purposes for which personal information is collected, used, processed, disclosed, retained, and disposed of.

Throughout this Privacy Policy, we use the term "personal information or data" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific user.

3 SCOPE AND CONSENT

As a Customer, you accept this Privacy 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 referred to as "Mitera Health Services").

This Privacy Policy is intended to govern the use of Mitera Health Services by users (including, without limitation those who use these Mitera Health Services in the daily course of their trade, practice, or business) unless otherwise agreed through contract. Users reserve the right to exercise their data protection rights as listed under the Customer Data Protection Rights.

4 COLLECTION OF PERSONAL INFORMATION

We collect Personally Identifiable Information (PII), otherwise known as Personal Information or Personal Data. They include Name, email address, phone number, contact address, limited financial information, location data, device data, health information etc.

5 HOW WE COLLECT PERSONAL INFORMATION

Customers' data is collected electronically and manually when they visit our website and register to use any of our services. This is collected electronically with exchanges between your system (Computer, Server, Mobile Device) or service provider's system and our system.

We also collect Customers' data manually when they complete our product and services registration forms in registering to use any of our services. Similar data are also collected when customers or visitors' visit our physical locations for inquiries or business relationship.

We collect information from or about customers from other sources, such as through your contact with us, including our Customer Support interfaces – email, portal, phone calls, social media, and other communication channels; Customer support teams, Customer response to surveys, Training programs, Corporate Social Responsibility events, Promotional events, and interactions with members of Mitera Health or other companies (subject to their privacy policies and applicable law).

We may also obtain information about you from third parties such as identity verification services.

6 HOW WE USE COLLECTED INFORMATION

We collect personal information to provide users of our services with a secure, smooth, efficient, and customized experience. Furthermore, the information collected may also be used to provide Mitera Health Services and customer support; process transactions and send notices about your transactions; verify your identity, including during account creation and password reset processes; resolve disputes, collect fees, and troubleshoot problems; manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities; detect, prevent or remediate violations of policies or applicable user agreements.

We also collect personal information to improve Services by customizing your user experience; measure the performance of the Mitera Health Services and improve their content and layout; manage and protect our information technology infrastructure; provide targeted marketing and advertising, provide service update notices, and deliver promotional offers based on your communication preferences; contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging; perform creditworthiness and solvency checks, and compare information for accuracy and verify it with third parties.

Additionally, we may contact you via electronic means to notify you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed, to poll your opinions through surveys or questionnaires, or as otherwise necessary to service your account. Furthermore, we may contact you to offer coupons, discounts, and promotions, and inform you about Mitera Health Services or its services.

Finally, we may contact you as necessary to enforce our policies, applicable law, or any agreement we may have with you. When contacting you via phone, to reach you as efficiently as possible we may use, and you consent to receive, auto dialed or prerecorded calls and text messages. Where applicable and permitted by law, you may decline to receive certain communications.

7 PROTECTION AND STORAGE OF PERSONAL INFORMATION

We store and process your personal information onsite on our computers in Lagos, Nigeria, and anywhere else 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 have also taken additional measures by ensuring our system complies with industry information security standards.

8 MARKETING

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine customer's information with information collected from other companies and use it to improve and personalize Mitera Health's Services, content, and advertising. We have also included an opportunity for customers that had initially subscribed to receiving notification or information about their activities in relation to the use of Mitera Health's service to unsubscribe or request to be removed from applicable databases.

9 SHARING PERSONAL INFORMATION WITH OTHER MITERA HEALTH USERS

When transacting with others, we may provide those parties with information to complete the transaction, such as your name, account ID, contact details, shipping and billing address, or other information needed to promote the reliability and security of the transaction. If a transaction is held, fails, or is later invalidated, we may also provide details of the unsuccessful transaction.

To facilitate dispute resolution, we may provide a buyer with the seller's address so that goods can be returned to the seller. The receiving party is not allowed to use this information for unrelated purposes, such as to directly market to you, unless you have agreed to it. Contacting users with unwanted or threatening messages is not authorized by Mitera Health.

We may provide or display customer information to a third-party while consummating transactions to validate that transactions are being exchanged with valid receivers.

We work with third parties, including merchants, to enable them to accept or send payments from or to Customers using Mitera Health Services. In doing so, a third party may share information about customers with us, such as email address or mobile phone number, to inform such customer that a payment has been sent. We use this information to confirm that users are Mitera Health customer and that Mitera Health as a form of payment can be enabled, or to send customer notification of payment status. Also, we may oblige a request to validate that a customer transacts business with Mitera Health.

Customer's card information may be available for their reuse subsequent if they chose to be remembered at previous attempts. Do note that merchants, sellers, and users involved in transactions may have their own privacy policies, and Mitera Health does not allow the other transacting party to use this information for anything other than providing Mitera Health Services, Mitera Health is not responsible for their actions, including their information protection practices.

Mitera Health will not disclose your credit/debit card number or bank account number to anyone or with the third parties that offer or use Mitera Health Services, except with customers' express permission or if we are required to do so to comply with credit/debit card rules, a subpoena, or other legal processes.

10 SHARING PERSONAL INFORMATION WITH THIRD PARTIES

We may share customers' personal information with:

- 1, Partners of Mitera Health to provide joint content, products, and services (such as registration, transactions, and customer support), to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about their products, services, and communications. This information will only be used for marketing communications only if customers have requested for the services.
- 2, Financial institutions that we partner with to jointly create and offer a product may only use this information to market Mitera Health related products unless the customer has given consent for other uses.
- 3, Companies that we plan to merge with or are acquired by. (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to customer personal information. Customers will receive prior notice if personal information would be used contrary to this policy).
- 4, Law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other legal process or requirement applicable to Mitera Health or one of its affiliates; when we need to do so to comply with law or credit/debit card rules; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our User Agreement.

Other unaffiliated third parties, for the following purposes:

- Fraud Prevention and Risk Management: to help prevent fraud or assess and manage risk.
- Customer Service: for customer service purposes, including to help service your accounts or resolve disputes.
- Legal Compliance: to help them comply with anti-money laundering and counter-terrorist financing verification requirements.
- Service Providers: to enable service providers under contract with us to support our business operations, such as fraud prevention, bill collection, marketing, customer service, and technology services. Our contracts dictate that these service providers only use customer information in connection with the services they perform for us and not for their own benefit.
- Other third parties with your consent or direction to do so.

Please note that these third parties may be in other countries where the laws on processing personal information may be less stringent than in our country of primary jurisprudence.

If customers open any of our products and services or related wallet account directly on a third-party website or via a third-party application, any information that are entered on such systems (and not directly on a Mitera Health website) will be shared with the owner of the third-party website or application. These sites are governed by their own privacy policies and customers are encouraged to review their privacy policies before providing them with personal information. Mitera Health is not responsible for the content or information practices of such third parties.

11 CROSS BORDER TRANSFERS OF PERSONAL INFORMATION

Mitera Health is committed to adequately protecting customers' personal information regardless of where the data resides and to providing appropriate protection for where such data is transferred across borders, including outside of Nigeria. We have further taken measure to ensure our relationships are with countries that are governed by similar data protection regulation as we are, and further assessment of other entities are being taken to provide a reasonable assurance of the safety of customer's information.

12 CUSTOMER DATA PROTECTION RIGHTS

Our customers have data protection rights and are entitled to the following:

The right to access – Customer has the right to request copies of their personal data. Mitera Health may charge a fee for this service if it will require a substantial amount of resources to accomplish.

The right to rectification – Customers have the right to request that Mitera Health correct any information they believe and have proven have been captured inaccurately. Customers also have the right to request Mitera Health to complete the information they believe is incomplete.

The right to erasure – Customers have the right to request that Mitera Health erase their personal data, under certain conditions. These conditions are not limited to regulatory requirements, law enforcement agencies, or where such action may cause disruption to our system.

The right to restrict processing – Customers have the right to request that Mitera Health restrict the processing of their personal data, under certain conditions. (as above)

The right to object to processing – Customers have the right to object to Our Company's processing of your personal data, under certain conditions. (as above)

The right to data portability – Customers have the right to request that Mitera Health transfer the data that we have collected to another organization, or directly to them, under certain conditions. (as above)

Customer requests based on any of the rights above shall be handled between 2 to 4 working weeks. Customer may contact us by email or writing to us at: info@miterahealth.com.ng

13 OUR USE OF COOKIES (AND COMPARABLE TECHNOLOGIES)

When you access our websites as a Customer, User or Visitor, or use Mitera Health services, we may place small data files on your computer or other devices. These data files may be cookies, pixel tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively referred to as "Cookies"). These technologies are used to recognize users as customers; customize Mitera Health Services, content, and advertising; measure promotional effectiveness; help ensure that account security is not compromised; mitigate risk and prevent fraud, and to promote trust and safety across Mitera Health Services and related sites.

Visitors and users can freely decline our Cookies if the web browser or browser add-on permits unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with users' use of our websites and other Mitera Health Services.

14 PRIVACY POLICIES OF OTHER WEBSITES

This privacy policy applies to only Mitera Health and not any other brands, though they may be mentioned on our Websites. Neither does this policy apply to our Merchants, Vendors, or other related partners.

15 CUSTOMER CONSENT

Please refer to the end of this notice for providing your consent. Your consent to personal data collection and processing may be revoked by notifying us via our contact page. For users below the age of 16, the consent should be provided by the holder of parental responsibility of the child.

Please note, in case you choose to not provide us with the consent or withdraw the consent at any given point of time, we shall not be able to provide the services as detailed in section 2.2 of this notice.

16 CHANGES TO OUR PRIVACY POLICY

We review our privacy policy periodically and when there is any substantial change to business or regulatory requirements. At the minimum, we shall review this annually and communicate via our communication channels such as Newsletter, on Website, Social Media Accounts.

17 HOW TO CONTACT US

Customers who have concerns, questions about the privacy policy or would like to exercise their protection rights can contact us through the following channels:

Email us at:

info@miterahealth.com.ng

Call us at:

+234 90 625 4 7420

Customer Contact Centre:

090 625 4 7420

WhatsApp Contact Line:

+234 91 652 3 2005

Or write to us at:

Mitera Health Limited, 11, Odunuga Street, Opebi, Ikeja, Lagos State, Nigeria.

18 DECLARATION

I have read all the terms and conditions within this Notice and hereby agree/ disagree to use of my personal data for the above-mentioned purposes.