

# **Sapphire Dairy Alternatives (Sapphire DA) Customer Privacy Statement**

## **I. Introduction**

This Privacy Statement describes how Sapphire DA collects, use, protect and share the personal information of our customers. Customers include those who visit our physical locations, use our websites and mobile apps, and otherwise interact with us.

## **II. Your Privacy Globally**

The data controller of your personal information is the Sapphire DAs' entity in the jurisdiction where your personal information is collected ("we" or "us").

This Privacy Statement does not apply to our distributors or to websites or mobile apps that they operate. Please reference our distributor's privacy notices for information on how they collect and use customer information.

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### **1. Information we collect**

We may collect personal information about you when you visit our physical locations, use our websites or mobile apps ("online services"), and otherwise interact with us (collectively, "services"). The information we collect falls into three categories: (a) information you provide to us; (b) information we collected through automated methods when you use our services; and (c) information we collect from other sources (read below).

Generally, you are under no obligation to provide your personal information. However, in certain cases, we may be unable to provide you with our services unless you provide your personal information.

We may combine the information you provide to us with information that we collect through automated methods, and with information we receive from other sources. For example, when you add a method of payment to your profile in our mobile app, we may combine your profile with information we receive from our payment processors or other providers regarding transactions made with the same payment credentials at our physical locations.

## We collect information you provide to us

You may provide the following information to us, depending on how you interact with us:

- personal details, such as your name, postal and email addresses, phone number, birthday information and other contact information, when you register with our online services, log-in to Wi-Fi, enter one of our competitions, or contact us by phone or through our online services;
- demographic information such as age or gender;
- transaction information, including information about the products you buy, prices, method of payment and payment details;
- account information, such as your username or password (or anything else that identifies you) used to access our online services or to buy or use our products and services;
- profile information, including products and services you like, or times you prefer to visit us; and
- other personal information you choose to provide us when you interact with us (including through social media).

## We collect information through automated methods

We may use automated technology to collect information from your computer system or mobile device when you visit our locations and or use our online services. Automated technology may include cookies, local shared objects, and web beacons. There is more information below about cookies and other technologies [in Section 6](#).

We may collect information about your:

- internet protocol (IP) address;
- computer or mobile-device operating system and browser type;
- type of mobile device and its settings;
- unique device identifier (UDID) or mobile equipment identifier (MEID) of your mobile device;
- device and component serial numbers;
- advertising identifiers (for example, an Identifier for Advertising (IDFA) on Apple devices) or similar identifiers;
- referring webpage (a page that has led you to ours) or application;
- online activity on other websites, applications or social media;
- visits to our physical locations, where recorded using digital technology (e.g. video recordings); and
- activity related to how you use our online services, such as the pages you visit on our websites or in our mobile apps.

Our online services and may collect information about the exact location of your mobile device or computer using geolocation and technology such as GPS, Wi-Fi, Bluetooth, or cell tower proximity. For most mobile devices and computer systems, you can disable the collection of this information by using the device or web-browser settings. If you have any questions about how to prevent us from collecting exact information about your location, we recommend you contact your mobile-device service provider, the device manufacturer, or your web-browser provider. Some online services may not work properly without information about your location.

## We collect information from other sources

We may collect information about you from our business partners and vendors (e.g., food delivery platforms, data providers, or payment processors) or from public sources (e.g., your public social media posts).

## 2. How We Use the Information We Collect

We use the information we collect for the following purposes:

- to provide our products and services and contract with you, including payment processing and customer support;
- to manage our relationship with you, including feedback management and for customer surveys;

- to personalize and improve our products and services and your overall customer experience, in particular by improving our existing technologies and developing new products and services and employing profiling technology (unless we notify you separately thereof, this will not include automated individual decisions that have legal effects for you or similarly significantly affect you);
- to provide you with general and personalized electronic and non-electronic direct marketing information and support our targeted advertising initiatives concerning our products and services as well as our business partners' products and services (including promotions, contests, prize draws, competitions, and sweepstakes);
- business analytics, including consumer and operations research, to assess the effectiveness of our sales, online service, marketing, and advertising, and to analyze market trends and (future) customer demand;
- to ensure the security of our online services, including the detection, prevention, and investigation of attacks;
- to protect against, identify and prevent fraud and other crime, claims and other liabilities;
- to protect the rights, safety, health, and security of our customers, our employees, our franchisees, and the general public, and to protect our property;
- to anonymize your information for further internal and external use in a manner that does not identify you;
- to comply with legal obligations, our policies, or our Standards of Business Conduct; and
- to establish, exercise or defend a legal claim.

We may use the information we collect about you in other ways, which we will tell you about at the time we collect it or before we begin using it for those other purposes.

### 3. How We Share the Information

#### We Collect

We do not sell your personal information and only share your information as described in this Privacy Statement or as otherwise communicated to you at the time we collect your information. Many companies have common arrangements with online advertising networks and analytics companies that may potentially be considered sales under these definitions

We may share your personal information with:

- vendors who help us operate our business (including information technology service providers and marketing agencies that we use as well as those who use the information to detect or prevent fraud for us, and who may use the information to provide fraud detection and prevention services to others);
- public authority and courts;
- buyers or other parties involved in a corporate transaction if we decide to sell or transfer all or part of our business;
- our professional advisers such as our legal representatives, auditors and insurance brokers; and
- business partners if they are involved in your customer experience, including product or service delivery (e.g., delivery partners and or platforms).

## 4. Children's Privacy Notice

We understand how important it is to protect your privacy when you use our online services. We are especially committed to protecting the privacy of children who visit or use our online services. For more information on how a specific country protects children's privacy, please review the country specific addendum.

We urge parents to regularly monitor and supervise their children's online activities. If you have any questions about our children's privacy practices, please contact us using our addresses provided in this policy.

## 5. Your Choices and Rights

### Marketing Communications

If you are subscribed to our marketing communications, you can later opt out by following the opt-out instructions in the marketing communications we send you. You can also generally find your communication preferences with instructions on how to opt out in the profile section of the online services that you use. You may also have the ability to change your communication preferences using your device settings. You can also opt out by contacting us using the contact information provided below.

If you do opt out of receiving marketing communications from us, we may still send communications to you about your transactions, any accounts you have with us, and any contests, competitions, prize draws or sweepstakes you have entered. Opting out of one form of communication does not mean you have opted out of other forms as well. For

example, if you opt out of receiving marketing emails, you may still receive marketing text messages if you have opted in to receiving them. Please note that if you are receiving communications from a distributor or e commerce platform, then you will need to opt out from them directly.

We do not share personal information with third parties for their own direct marketing purposes, unless you give us permission to do so. When we give you notice, and you consent, we will share your personal information as you direct us to.

## Your Personal Information Rights

Under applicable law, you may have the rights (under the conditions and to the extent set out in applicable law):

- to check whether and what kind of personal information we hold about you and to access or to request copies of such data;
- to request correction, supplementation, anonymization, blocking or deletion of information about you that is inaccurate, incomplete, outdated, unnecessary, excessive or processed in non-compliance with applicable requirements;
- to request the restriction of the collection, processing or use of information about you;
- in certain circumstances, to object for legitimate reasons to the processing of your information or to revoke consent previously granted for the processing while the latter does not affect the lawfulness of processing before the revocation;
- to request data portability; and
- to lodge a complaint with the competent authority.

For more information regarding these rights, and the countries where these rights are available, please refer to the country specific addendum.

## 6. Use of Our Online Services and Other Technology

We and our vendors may use cookies, web beacons and other similar technologies on our online services and in other areas related to our business, such as online advertising, to collect information and provide you with the services or products that you have requested.

### Cookies and other technologies

A "cookie" is a small text file that is placed onto an Internet user's web browser or device and is used to remember and/or obtain information about the user.

A "web beacon" is a small object or image that is embedded into a web page, application, or email and is used to track activity. They are also sometimes referred to as pixels and tags.

Please note the following:

- You might be assigned a cookie when using our online services.
- We offer certain features that are available only through the use of cookies and other similar technologies.
- We may use both session (for the duration of your visit) and persistent (for the duration of a fixed period of time) cookies and other tracking technologies.
- Our online services and other areas related to our business may have web beacons.

Both we and selected third parties (such as our advertising networks) may use these technologies to collect information about your online activities, over time and across third-party websites and devices, and when using our online services to further personalize your experience with us.

Use the options in your web browser if you do not wish to receive a cookie or if you wish to set your browser to notify you when you receive a cookie. Select the "Help" section of your browser to learn how to change your cookie preferences. If you disable all cookies, you may not be able to take advantage of all the features available on a website.

Some newer web browsers may have a "Do Not Track" preference that transmits a "Do Not Track" header to the websites you visit with information indicating that you do not want your activity to be tracked. Sapphire Dairy Alternatives does not currently take actions to respond to Do Not Track signals because a uniform technological standard has not yet been developed. We continue to review new technologies and may adopt a standard once one is created.

More information regarding how cookies and related technologies are used in a country in which you are a customer may be available in the country-specific addendum or a cookie preferences section of the online service.

## Targeted advertising

When you use our online services, we (and our vendors) may collect information about your activities so that we can provide you with advertising tailored to your interests.

Because we utilize advertising ("ad") networks, you may see certain ads on other websites. Ad networks allow us to target the information we send you based on your interests, other

information related to you, and contextual means. These ad networks track your online activities over time by collecting information through use of cookies, web beacons, and other technologies. The ad networks use this information to show you advertisements that may be of particular interest to you. The ad networks we utilize may collect information about your visits to websites that also take part in the relevant ad network, such as the pages or advertisements you view and how you use the websites. We use this information, both on our online services and on third-party websites that take part in the ad networks, to provide you with advertising tailored to you, and to help us assess how effective our marketing is.

You can opt out of targeted advertising by visiting our website or sending an email to [mail@sapphiredairyfree.com](mailto:mail@sapphiredairyfree.com). If you choose to opt out, you will continue to receive advertisements but they will not be tailored to your interests. Please refer to the cookie preferences section of the online service for further information on your choices concerning target advertising. Moreover, depending on the type and version of the operating system of your mobile device, you may also be asked whether to enable targeted advertising.

## 7. Links to Other Websites and Social Media

Our online services may offer links to websites that are not run by us but by third parties. If you visit one of these linked websites, you should read the website's privacy policy, terms and conditions, and their other policies. We are not responsible for the policies and practices of third parties. Any information you give to those organizations is dealt with under their privacy policy, terms and conditions, and other policies.

We may also have providers of other apps, tools, widgets and plug-ins ("Plug-Ins") on our online services, such as Facebook "Like" buttons, which may also use automated methods to collect information about how you use these features. These organizations may use your information in line with their own privacy policies. Please refer to the country-specific addendum for further information on your choices concerning such Plug-Ins.

## 8. Information Security

We are committed to taking appropriate measures designed to keep your personal information secure. Our technical, organizational and physical measures are designed to protect personal information from accidental, unlawful or unauthorized loss, access, disclosure, use, alteration, or destruction. While we make efforts to protect our information systems, no website, mobile application, computer system, or transmission of information over the internet or any other public network can be guaranteed to be 100% secure.



## 9. Retention

We keep your information for the length of time needed to carry out the purposes outlined in this Privacy Statement and to adhere to our policies on keeping records (unless a longer period is needed by law). Our records policies reflect applicable laws. We will retain and use your information to the extent necessary to manage your relationship with us, personalize and improve your overall customer experience, and to comply with our legal obligations (for example, if we are required to retain your information to comply with applicable tax/revenue laws), resolve disputes, enforce our agreements, and as otherwise described in this Statement.

## 10. Changes to Our Privacy Statement

This Privacy Statement is in effect as of the date noted at the top of the statement. We may change this Privacy Statement from time to time. If we do, we will post the revised version here and change the "last updated date" (the date it applies from) at the top of the statement and/or contact you directly where we deem appropriate to do so under applicable law. You should check here regularly for the most up-to-date version of the statement.

## 11. How to Contact Us

In line with our Standards of Business Conduct, we hold ourselves to ethical standards when it comes to data privacy and protection and we welcome any feedback or questions you may have concerning the collection and processing of your personal data. Our contact details.

Attention: Team Leader Sapphire Dairy Alternatives Ltd  
Plot 742 Bunga Kalungu, Makindye Division, Kampala Uganda.

Email: [mail@sapphiredairyfree.com](mailto:mail@sapphiredairyfree.com) or [sapphiremilks@gmail.com](mailto:sapphiremilks@gmail.com)