

# PRIVACY POLICY

Effective Date: \_\_\_\_\_[Date]

Last Updated: \_\_\_\_\_

## 1. INTRODUCTION

Lifa Holdings Limited ("Lifa", "we", "us", "our") respects your privacy and is committed to protecting your personal data in accordance with the Malawi Data Protection Act, 2024 and other applicable laws.

This Privacy Policy explains how we collect, use, disclose, and protect your personal data when you use our mobile application ("App"), website, and related services ("Services"). By using our Services, you consent to the practices described in this Policy.

## 2. WHO WE ARE

Lifa Holdings Limited is a technology company registered in Malawi (Registration Number: [Insert CRN]\_\_\_\_\_ with registered office at [Insert Address]. We operate the Lifa platform connecting customers with transportation, delivery, e-commerce, and other services.

Our Data Protection Officer can be contacted at:

Email:dpo@lifa.mw

Phone:+265\_\_\_\_\_

Address:\_\_\_\_\_ Address \_\_\_\_\_

## 3. DATA WE COLLECT

We collect the following categories of personal data:

### 3.1 Data You Provide Directly

- Account Information: Name, email address, phone number, profile photo, password.
- Verification Documents: Government ID, driver's license (for Drivers), business registration documents (for Merchants).
- Payment Information: Mobile money numbers, bank card details (processed by secure third-party payment processors).
- Communications: Messages to/from Drivers/Merchants, customer support inquiries, feedback, and ratings.
- Service Details: Pickup/drop-off locations, delivery addresses, order preferences.

### 3.2 Data Collected Automatically

- Device Information: IP address, device type, operating system, unique device identifiers.
- Usage Data: App features used, pages viewed, time spent, clickstream data.
- Location Data: Precise or approximate location from GPS, Wi-Fi, or cellular networks when the App is active. For Drivers, we collect continuous location data during active trips for safety and navigation.
- Transaction Data: Order history, payment amounts, cancellation history.

### 3.3 Data from Third Parties

- Referral Sources: If you were referred by another user.
- Verification Services: Background check providers (for Drivers).
- Social Media: If you connect your social media accounts (optional).
- Partners: From our business partners (e.g., payment processors).

#### 4. HOW WE USE YOUR DATA

We use your personal data for the following lawful purposes:

Purpose	Legal Basis
To provide and maintain our Services	Performance of contract
To process payments and prevent fraud	Legitimate interests, legal obligation
To verify your identity and eligibility	Legal obligation, legitimate interests
To communicate service updates, offers, and promotions	Consent, legitimate interests
To improve and personalize your experience	Legitimate interests
To ensure safety and security of all users	Legitimate interests, vital interests
To comply with legal and regulatory requirements	Legal obligation
To resolve disputes and provide customer support	Legitimate interests, performance of contract

#### 5. DATA SHARING AND DISCLOSURE

We may share your personal data with:

##### 5.1 Service Providers

- Payment processors (mobile money providers, banks)
- Cloud hosting services (data storage)
- SMS and email service providers
- Customer support platforms

- Analytics and marketing partners

## 5.2 Other Users (As Necessary for Service Delivery)

- For Customers: Your name, pickup location, and rating are shared with Drivers.
- For Drivers: Your name, photo, vehicle details, and rating are shared with Customers.
- For Merchants: Your order details and delivery address are shared for fulfillment.

## 5.3 Legal and Regulatory Authorities

When required by Malawian law, including:

- Malawi Communications Regulatory Authority (MACRA)
- Malawi Revenue Authority (MRA)
- Malawi Police Service (with proper legal process)
- Courts and tribunals

## 5.4 Business Transfers

In connection with a merger, acquisition, or sale of assets, your data may be transferred to the new entity.

We do not sell your personal data to third parties for their marketing purposes.

## 6. DATA STORAGE AND SECURITY

## 6.1 Data Retention

We retain your personal data only as long as necessary:

- Account data: While your account is active + 5 years after deactivation
- Transaction records: 7 years (as required by tax laws)
- Location data: 30 days for operational purposes, then anonymized
- Customer support communications: 3 years

## 6.2 Security Measures

We implement appropriate technical and organizational measures including:

- Encryption of data in transit (SSL/TLS) and at rest
- Regular security assessments and penetration testing
- Access controls and authentication mechanisms
- Secure development practices
- Employee training on data protection

## 6.3 Data Localization

We store and process personal data primarily within Malawi. Where cross-border transfers are necessary (e.g., using international cloud services), we ensure adequate safeguards are in place as required by the Data Protection Act.

## 7. YOUR RIGHTS UNDER MALAWI DATA PROTECTION ACT

You have the following rights regarding your personal data:

#### 7.1 Access and Portability

You may request a copy of your personal data in a structured, commonly used format.

#### 7.2 Rectification

You may request correction of inaccurate or incomplete data.

#### 7.3 Erasure ("Right to be Forgotten")

You may request deletion of your personal data, subject to legal limitations.

#### 7.4 Restriction of Processing

You may request temporary restriction of processing in certain circumstances.

#### 7.5 Objection to Processing

You may object to processing based on legitimate interests or for direct marketing.

#### 7.6 Withdraw Consent

Where processing is based on consent, you may withdraw it at any time.

## 7.7 Lodge a Complaint

You have the right to complain to the Data Protection Authority in Malawi.

To exercise these rights, contact our Data Protection Officer at [dpo@lifa.mw](mailto:dpo@lifa.mw). We will respond within 30 days as required by law.

## 8. COOKIES AND TRACKING TECHNOLOGIES

We use cookies and similar technologies to:

- Remember your preferences and settings
- Analyze usage patterns and improve our Services
- Deliver relevant advertisements (with your consent)
- Prevent fraud and enhance security

You can control cookies through your browser settings. Disabling certain cookies may affect Service functionality.

## 9. CHILDREN'S PRIVACY

Our Services are not intended for individuals under 18 years of age. We do not knowingly collect data from children. If we learn we have collected data from a child, we will delete it promptly.

## 10. MARKETING COMMUNICATIONS

We will only send you marketing communications with your explicit consent. You can opt-out at any time by:

- Clicking "unsubscribe" in any marketing email
- Adjusting notification settings in the App
- Contacting customer support

## 11. THIRD-PARTY LINKS

Our Services may contain links to third-party websites or services. This Privacy Policy does not apply to those third parties. We encourage you to review their privacy policies.

## 12. INTERNATIONAL DATA TRANSFERS

Where personal data is transferred outside Malawi, we ensure:

- The recipient country provides adequate data protection (as determined by Malawi's Data Protection Authority), OR
- We implement appropriate safeguards (standard contractual clauses, binding corporate rules), OR
- An exception under the Data Protection Act applies

## 13. UPDATES TO THIS POLICY

We may update this Privacy Policy periodically. We will notify you of material changes through:

- In-App notifications



- Email (if provided)
- Updated "Effective Date" at the top of this Policy

Your continued use of our Services after updates constitutes acceptance of the revised Policy.

#### 14. CONTACT INFORMATION

For privacy-related inquiries or to exercise your rights:

Data Protection Officer

Lifa Holdings Limited

\_\_\_\_\_Address

Email:dpo@lifa.mw

Phone:+265\_\_\_\_\_ [Phone Number]

Hours:Monday-Friday, 8:00 AM - 5:00 PM

For general inquiries:

Customer Support:support@lifa.mw

Website:www.lifa.mw

#### 15. MULTI-LANGUAGE VERSION

This Policy is prepared in English. If translated into Chichewa or other languages, the English version shall prevail in case of discrepancies.

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## ACKNOWLEDGMENT

By using Lifa's Services, you acknowledge that you have read, understood, and agree to this Privacy Policy.

Lifa Holdings Limited

Company Registration Number \_\_\_\_\_

[Address \_\_\_\_\_

Date \_\_\_\_\_