

PRIVACY POLICY

Odiyo Ltd (“**Odiyo**”) is committed to respecting your privacy and to complying with applicable data protection and privacy laws. This Privacy Policy is provided to help you understand how we may collect, use, protect, and otherwise deal with your personal information when you use our audiobook services (our “Services”).

You acknowledge that by providing your personal information to Odiyo Ltd, you consent to the processing of your data in accordance with this Privacy Policy.

You should read this Privacy Policy while keeping in mind that it should be read together with our Terms and Conditions of use for our Services.

Who we are

We are Odiyo Ltd, with our registered office at 9 Cherry Garden Drive, Kingston 8 and we operate an audiobook application (“App”)

Information that we collect

We may collect and use the following types of personal information:

- Contact information such as name, address, email address and telephone number;
- Social media profile information such as first and last name, email address, user identifier, profile picture, user geolocation, user IP address and profile URL;
- demographic information such as age range, marital status, gender;
- payment card information and billing address;
- information about your device such as device type/model, operating platform, time zone, user’s language, carrier name and geography, IP address, cookie identifiers, device identifiers; and
- how you use our Services such as user app session information, your preferences, your transaction history.

How and why we collect this information

We typically collect and process information when you:

- interact and visit our App;
- log in using your social media account or when you sign up and create your profile;
- buy, register or use any of our products and services;
- Make customer enquiries, register for information or other services;
- Respond to communications from us (such as SMS, emails, questionnaires or surveys);
- Contact us and provide your information through email or App; or
- Have given permission for third party companies to share your information with us.

We will use the information that you have given us:

- to verify your identity and validate your payment;
- for billing purposes;

Date of Revision: August 12, 2022

- to provide, maintain and develop our products and services;
- to assist with service related issues, account management, customer care and technical support;
- to improve the performance of our services, products and service development, and customer care;
- to carry out marketing analysis to tailor the services to your preferences and interests;
- to market our products and services; and
- to carry out statistical analysis such as analysing the performance of our products and services and to understand how our customers use them.

Legal basis for using your information

We will only use your personal data where we have a legal ground to do so. In every case, the legal ground will be one of the following:

- Where you give us your consent - you can withdraw your consent at any time by contacting us via our contact details.
- For our legitimate business interest, so that we can run an efficient and effective business.
- For the performance of our contract with you – that is to provide you with the products and services you have requested, bought or subscribed to.
- To comply with our legal and regulatory obligations, including for example tax and accounting requirements, financial or telecommunications regulations.

Linked Sites

The App may contain links to third-party websites not controlled by Odiyo or covered by this Privacy Policy. Please be aware that we are not responsible for the content or privacy of those third party websites, and we recommend that you check the privacy notices of those other websites you visit before providing any personal information.

Sharing

Odiyo does not sell, trade, transfer or otherwise share your information except in the following instances:

- as required by law, such as in conjunction with a subpoena, government inquiry, litigation, dispute resolution or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your security, investigate fraud or respond to a law enforcement request;
- with Odiyo service providers, and contracted third parties who work on our behalf and who do not have an independent right to use the information to which they have access or that we disclose to them. Odiyo ensures that all these third parties have signed contracts that include confidentiality and data protection clauses;
- with our business partners for Odiyo's marketing activities, in such case no specific personally identifiable information is provided, as such information is generally aggregated;
- with third parties for research and development purposes in such case no specific personally identifiable information is provided;
- with our subsidiaries and affiliates.

We may share and transfer your information to our vendors, partners, suppliers (altogether “our service providers”) across the world. These service providers have signed contracts with us provide for a strict duty to keep all personal information confidential and to use it only for the purpose for we have contracted them in an accordance with strict policies consistent with our commitment to keep your information confidential and secure.

Data Transfers and Storage

We may have to transfer data to jurisdictions outside of the jurisdiction where we collected such information. In these circumstances, Odiyo will ensure secure data transfers using secure technologies and practices to secure data from unauthorized access or interception.

The above notwithstanding, please be aware that communications over the public Internet, such as email/webmail, facsimile, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered - this is the nature of the World Wide Web. Odiyo cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

Account Deletion & Data Retention

On account deletion, Odiyo may retain certain information as required by law or regulations. We keep your personal information for no more than is necessary for the purposes set out in this Privacy Policy unless we are required to keep it for such other period to comply with legal, tax or regulatory reasons. When we no longer need or are not required to keep your information we will securely delete your information and ensure all recipients of your data also comply with the same.

Where you have given us your consent to use your information and you decide to withdraw that consent, we will delete your personal information unless we are required to keep it for reasons we have explained above. We may need to keep a piece of your contact information e.g. your email address in our records so we know that you have withdrawn your consent and ensure we honour your choice.

Security

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information to operate, develop or improve our services. We also engage well-known technologies including but not limited to firewalls, anti-virus, intrusion detection, SSL (Secure Sockets Layer), routine network vulnerability assessment and 24 x 7 monitoring of our network. Please be aware that although we endeavor to provide reasonable security for the information we process and maintain, no security system can prevent all potential security breaches.

Your data protection rights

You can do any of the following at any time by contacting us:

- Request to see a copy of the information we have about you;
- Request to update any incorrect or inaccurate information we have about you;
- Restrict or object to us processing your information in certain circumstances;
- Have us delete any information we have about you in certain circumstances;
- Transfer the information you gave us to another organisation, or to you, in certain circumstances;
- Express any concern you have about our use of your information;
- To opt-out of marketing messages – you can also opt-out by clicking the ‘unsubscribe’ link at the end of any marketing email, or disable push notifications, or change your preferences within your device settings; and
- To opt-out of automated profiling e.g. online behaviour analytics.

Privacy Support & Inquiries

If you have concerns or questions regarding this Privacy Policy or if you wish to update your personal information or stop the collection of your personal information, please contact us at the contact details stated in the App.

Changes to this Privacy Policy

Odiyo reserves the right to amend or modify this Privacy Policy at any time and in response to changes in applicable data protection and privacy laws. Notice of any such change along with the revised policy will be posted on our website.