



Boda Boda Privacy Policy

Version 1.0

1. Background

1.1 General

Boda Boda Pvt Limited (PV00228903) is a Limited liability company and incorporated under Companies Act No. 07 of 2007.

Boda Boda is committed to protecting your privacy, in accordance with applicable Sri Lanka privacy laws. This policy (**Privacy Policy**) is designed to give you a greater understanding of how we collect, use, disclose, and otherwise handle the personal information you provide to us.

A copy of this Privacy Policy is available on request a copy by contacting our Privacy Officer (011 755 0051 or email info@bodaboda.lk).

We may amend this Privacy Policy from time to time. All amended terms will automatically take effect immediately on posting. Please check this Privacy Policy periodically to inform yourself of any changes. If you do not accept the changes made to this Privacy Policy, you should immediately stop using our products and services.

1.2 What is personal information?

In general terms, legislation defines 'personal information' as information or an opinion about an identified individual or a reasonably identifiable individual, whether the information is true or not, and whether the information or opinion is recorded in a material form or not.

1.3 Our obligations

We adhere to the principles outlined in the Sri Lanka Data Protection Act, which governs the handling of personal information in accordance with its regulations. These principles oversee the entire life cycle of personal data, including its collection, usage, disclosure, security measures, accessibility, and disposal.

The Privacy Act also includes a data breach notification regime, which requires us to address data breaches involving personal information held by Boda.

We also adhere to specific privacy legislation in certain situations, such as relevant provisions within Sri Lanka's legal framework concerning electronic communications and regulations governing unsolicited communications.



1.4 **Employee records**

We are generally exempt from the *Privacy Act* when we collect, and handle employee records and this Privacy Policy does not apply to that information. However, where State or Territory health privacy legislation applies, we are still required to protect the privacy of employee health information. This Privacy Policy will apply in those circumstances.

2. **What we collect**

2.1 **General**

The type of personal information that we collect about you depends on the type of dealings you have with us. For example, if you:

- **are a client of our services**, we will collect your name, contact details (such as address, telephone number, and email address), gender, employment details, details of the services that you are interested in or have agreed to purchase, what prompted you to enquire about our services, how you heard about us
- **are a registered user of our services**, we will collect your name, and contact details (such as address, telephone number, and email address)
- **are a service provider**, we will collect your name and contact details, details about the goods or services you supply, and payment details.
- **send us an inquiry, complete a registration of interest, or provide us with feedback**, we may collect your name, contact details, details of your inquiry or feedback, and information about our response.
- **ask us to send you information about our services**, we will collect your name, address, contact details, details of the services you are interested in, and how you heard about
- **apply for a job with us**, we will collect the information you include in your job application, including your cover letter, resume, contact details, and referee reports.
- **enter into any promotions, competitions, or special offers**, we will collect the information you provide when submitting your entry.

In addition to the above, if you interact with us generally, we will collect your details (e.g. name, telephone number, email address), details of the services you are interested in, how you heard about us or our services, and details of your dealings with us. Other information may be collected from other sources, but those sources should provide you with details of what personal information is being collected and why.

The personal information collected may vary depending on your particular interaction with us but will be limited to that information necessary to record and manage our interaction with you (e.g. your name, relevant contact details, and information about the interaction) and to that information required to enable you to participate in our services being offered on the Site.



2.2 Sensitive information

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection, such as health information. We only collect sensitive information where it is reasonably necessary for our functions or activities and either:

The individual has consented, or we are required or authorized by or under the law (including applicable privacy legislation) to do so.

2.3 Collection of information other than personal information through our website

When you visit our Site, some of the information that is collected about your visit is not personal information, as it does not reveal your identity.

Site visit information

For example, we record your server address, the date and time of your visit, the pages you visited, any documents you downloaded, the previous site you visited, and the type of device, browser, and operating system you used.

We use and disclose this information in anonymous, aggregated form only, for purposes including statistical analysis and to assist us to improve the functionality and usability of our Site. You are not individually identified; however, we reserve the right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our Site, or where we are otherwise required or authorized by law to do so.

Cookies

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies we use do not identify individual users, although they do identify the user's internet browser.

We use cookies to hold anonymous session information. This information is used to personalise your current visit to the Site, for example to allow the Site to remember who you are by keeping server variables linked to your session.

We only use non-persistent cookies. That is, they are held on your browser's memory only for the duration of your session.

Most internet browsers are set to accept cookies. If you prefer not to receive them, you can adjust your internet browser to reject cookies, or to notify you when they are being used. There are also software products available that can manage cookies for you. Rejecting cookies can, however, limit the functionality of our website.

Online Behavioural Advertising

We use advertising programs that place cookies on your computer to collect information about your browsing history (including on external websites). This information, which does not identify you personally, is collected in order to improve your online experience by customizing the advertising you see to your interests (including the display of more relevant ads on external websites). You can opt out of these programs at any time by clicking [here](#).



2.4 What if you don't provide us with your personal information?

We will provide individuals with the option of not identifying themselves, or of using a pseudonym when dealing with us if it is lawful and practicable to do so. A pseudonym is a name or other descriptor that is different to an individual's actual name.

For example, you can access our Site and make general phone queries without having to identify yourself.

In some cases, however, if you don't provide us with your personal information when requested, we may not be able to provide you with the product or service that you are seeking. For example, you must identify yourself to register yourself as a user or provide your contact details for delivery notifications.

3. How we collect personal information

3.1 Methods of Collection

We collect personal information in a number of ways, including:

- directly from you in person (for example, if you register as a user, visit our office, or at events or conferences)
- through our Site (for example, by registering yourself as a user via the Site or making an online inquiry)
- through our social media pages (for example, through Twitter, LinkedIn, or our Facebook page)
- over the telephone
- through written correspondence (such as letters, faxes, and emails)
- on hard copy forms (for example, competition entry forms and surveys)
- through surveillance cameras at our corporate premises
- from third parties, including our clients who use our services.

3.2 Collection notices

Where we collect personal information about you, we will take reasonable steps to provide you with certain details about that collection (such as why we are collecting the information and who we may share it with). We will generally include this information in a collection notice.

Collection notices provide more specific information than this Privacy Policy. The terms of this Privacy Policy are subject to any specific provisions contained in collection notices and in the terms and conditions of particular offers, products and services. We encourage you to read those provisions carefully.



3.3 Unsolicited information

Unsolicited personal information is personal information we receive that we have taken no active steps to collect (such as an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement).

We may keep records of unsolicited personal information if the *Privacy Act* permits it (for example, if the information is reasonably necessary for one or more of our functions or activities). If not, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

4. Why we collect personal information.

The main purposes for which we collect, hold, use, and disclose personal information are set out below:

- to verify your identity and conduct credit and other necessary checks such as police checks, visa checks, or pre-employment checks;
- to fulfil our obligations as the service provider;
- designing, develop, operate, deliver, and improve our services;
- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the products, services, and information that you request from us;
- outlining our services to prospective and existing customers.
- obtaining finance for the business.
- providing you with information and the services that you have requested.
- to communicate with you, including by email, mail, or telephone.
- analysing and processing information collected through our services and Site.
- processing transactions and any applicable payments and for our billing and account purposes.
- to administer our Site and internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- promoting ourselves and our services, including through direct marketing, events, and competitions.
- performing research and statistical analysis, including for customer satisfaction and service improvement purposes.
- protecting the security of client/user information and data, our offices, staff, and the property held on our premises.
- to assist you with inquiries, resolving complaints, or to improve our customer service;



- recruiting staff and contractors.
- to update our records.
- to enforce the terms of any agreement that relating to our services; and comply with legal and regulatory obligations including notifying you of matters that we may be required by law to notify you of.

We may also collect, hold, use, and disclose personal information for other purposes explained at the time of collection or:

- which are required or authorized by or under the law (including, without limitation, privacy legislation); and
- for which you have provided your consent.

4.1 **Direct marketing**

You consent (until such time as you opt-out, as described below) that we may use your personal information to let you know about us, the services of ours (including promotions, special offers, and events), and our third-party products and services, either where we have your express or implied consent, or where we are otherwise permitted by law to do so. We may contact you for these purposes in a variety of ways, including by mail, email, SMS, telephone, and online advertising.

Opting out

Where you have consented to receive marketing communications from us, your consent will remain current until you advise us otherwise. However, you can opt-out at any time, by:

- contacting us (details under the heading 11 below);
- advising us if you receive a marketing call that you no longer wish to receive these calls; or
- using the unsubscribe facility that we include in our commercial electronic messages (such as emails and SMSes).

Once you do this, we will update your profile to ensure that you don't receive further marketing messages. Stopping marketing messages will not stop service communications (such as contract updates).

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Boda Boda for marketing purposes.

Notification of source

If we have collected the personal information that we use to send you marketing communications from a third party (for example a direct mail database provider), you can ask us to notify you of our source of information, and we will do so unless this would be unreasonable or impracticable.



5. Who we may share your personal information with

We reserve the right to disclose your personal information, and by using our services, you authorize us to disclose your personal information, to our affiliated companies and relevant entities in accordance with the definitions provided in the Personal Data Protection Act, No. 9 of 2022.

We may also disclose your personal information, and you consent to us disclosing your personal information, to the following third parties:

- our clients who use our services and their authorized representatives.
- financiers and prospective financiers
- financial institutions for payment processing.
- an individual's agent or authorized representative.
- referees whose details are provided to us by job applicants.
- third parties who support our information technology or handle mailings on our behalf.
- our contracted service providers (including payment processors). In each case, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services;
- law enforcement agencies, other governmental agencies or third parties if we are required by law to do so, or in other limited circumstances (for example if required by a court order or regulatory authority, or if we believe that such action is necessary to prevent fraud or cyber-crime or to protect our Site, our services or our technology assets or the rights, property or personal safety of any person); and
- our professional advisers,

In each case, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

We may also disclose information to provide our services, to respond to legal requirements, enforce our policies, and protect our rights and property. Cross border disclosure of personal information We do not currently disclose personal information to third parties located overseas. If this changes at some time in the future, we will comply with the requirements of the *Privacy Act* that apply to cross-border disclosures of personal information and this Privacy Policy will be amended accordingly.



6. Data quality and security

6.1 General

We primarily hold data electronically, with the assistance of our third-party service providers. We are committed to keeping your personal information secure and confidential. Reasonable precautions will be taken to protect personal information from loss, misuse, unauthorized access or alteration. We take reasonable steps to:

- make sure that the personal information that we collect, use, and disclose is accurate, up-to-date and complete, and (in the case of use and disclosure) relevant.
- protect the personal information that we hold from misuse, interference, and loss and from unauthorized access, modification, or disclosure; and
- destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the APPs.

You can help us keep your information up to date, by letting us know about any changes to your details, such as your address, email address or phone number.

You acknowledge that the security of online transactions you conduct using the Site cannot be guaranteed. To the fullest extent permitted at law, we do not accept responsibility for misuse of or loss of, or unauthorized access to, your personal information where the security of that information is not within our control.

Within Boda boda, access to personal information is restricted to personnel on a need-to-know basis. We have directed our staff that personal information must be dealt with in accordance with this Privacy Policy and kept secure from unauthorized access or disclosure. We educate our staff about their duty to protect your privacy and provide training regarding this Privacy Policy.

6.2 Security

The steps we take to secure the personal information we hold include website protection measures (such as firewalls and anti-virus software), security restrictions on access to our computer systems (such as login and password protection), controlled access to our corporate premises, policies on document storage and security, personnel security (including restricting access to personal information on our systems to staff who need that access to carry out their duties), staff training and workplace policies.

We encrypt certain information using secure socket layer technology (SSL) and follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and after it is received.



Website security

While we strive to protect the personal information and privacy of users of the Site, we cannot guarantee the security of any information that you disclose online, and you disclose that information at your own risk.

IP Address

An IP (internet protocol) address is a number that is automatically assigned to your computer by your internet service provider when you log on. Your IP address is not linked to your personal information, but we do preserve the right to use IP addresses to identify individuals who may threaten our Site, data, services or clients. IP addresses may also be used to help diagnose problems with the Site and to gather broad demographic information.

Third-party websites

Links to third-party websites that are not operated or controlled by us are provided for your convenience. We are not responsible for the privacy or security practices of those websites, which are not covered by this Privacy Policy. Third-party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

Data breaches

If there is any breach of your personal information, we will deal with such breach and notify you in accordance with its obligations under the *Privacy Act*.

7. How long we keep your information.

We will only keep the information we collect about you for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate, up-to-date, and still required.

If you close an account you have with us or you decide not to go ahead with purchasing our product or services for which you have registered, we may still keep your information.

8. Mail and email information.

If you wish to stop receiving any e-mails or other communications from us which may be sent to you in the future, or if you have submitted personal information through the Site and would like to have that information deleted from our records, please unsubscribe through the link at the bottom of any email or notify us at info@bodaboda.lk

We will preserve the contents of any e-mail message that you send if we believe that we have a legal requirement to do so. E-mails sent to or from us are routinely monitored for quality control, systems administration, and legal compliance purposes.



9. Access and Correction

9.1 General

Please contact our Privacy Officer (details under heading 11 below) if you would like to access or correct the personal information that we hold about you. We may require you to verify your identity before processing any access or correction requests, to make sure that the personal information we hold is properly protected.

9.2 Access

We will generally provide you with access to your personal information, subject to some exceptions permitted by law. We will also generally provide access in the manner that you have requested (eg by providing photocopies or allowing a file to be viewed), provided it is reasonable and practicable for us to do so. We may however charge a fee to cover our reasonable costs of locating the information and providing it to you.

9.3 Correction

If you ask us to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant, or misleading, we will take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If we correct personal information about you, and we have previously disclosed that information to another agency or organization that is subject to the *Privacy Act*, you may ask us to notify that other entity. If so, we will take reasonable steps to do so, unless this would be impracticable or unlawful.

9.4 Timeframe for access and correction requests

Except in the case of more complicated requests, we will endeavour to respond to access and correction requests within 30 days.

9.5 What if we do not agree to your request for access or correction?

If we do not agree to your access or correction request, or if we do not agree to give you access in the manner you requested, we will provide you with a written notice setting out:

- the reasons for our decision (except to the extent that, having regard to the grounds for refusal, it would be unreasonable to do so); and available complaint mechanisms.

In addition, if we refuse to correct personal information in the manner you have requested, you may ask us to associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant, or misleading, and we will take reasonable steps to do this in such a way that will make the statement apparent to users of the information.



10. Complaints

If you have a complaint about how we have collected or handled your personal information, please contact our Privacy Officer (details under heading 11 below).

We will endeavour in the first instance to deal with your complaint and take any steps necessary to resolve the matter within a week.

If your complaint can't be resolved at the first instance, we will ask you to submit your complaint in writing. In most cases, we expect to investigate written complaints will be investigated and a response provided within 30 days of receipt. If the matter is more complex and our investigation may take longer, we will write and let you know, and tell you when we expect to provide our response.

11. Our contact details.

Please contact us if you have any queries about the personal information that we hold about you or the way we handle that personal information. Our contact details are set out below.

Mail: Boda Boda (Pvt) Limited, No 07, Suleiman Terrance, Colombo 05

Email: Info@bodaboda.lk

Telephone: 011 755 0051