

Customer Privacy Notice

Last updated on: October 18, 2022

This Privacy Notice is designed to provide protection and transparency into data practices of BEAPCapital Limited (“**BEAPCapital**” or “**BEAPWater**”) in line with Nigeria Data Protection Regulation 2019. You are required to read the sections below to understand how we collect, use, share, and safeguard your information in order to offer you the most seamless Atmospheric Water Generator (“**AWG**”) and associated energy experience imaginable.

Basic Notices

1. Note that your AWG generates system, diagnostic, location and water reading data (the “**AWG data**”). To protect your privacy from the moment you take delivery of your AWG, BEAPWater associates the AWG data generated with your identity or account by default in a highly secure environment for Data security.
2. BEAPWater aims to obtain and use a minimum amount of personal data necessary for displaying your in-app water and energy experience, providing services to you, and improving your AWG products.
3. BEAPWater shall and reserves the right to, and by subscribing to the AWG, you also give your consent to BEAPWater to share your personal data when needed for the purpose of providing services to you or your AWG or servicing your AWG
4. By subscribing to the AWG, you also give your consent to BEAPWater to share all your data and information with BEAPWater with BEAPWater’s Business Partners and their respective agents (“**Value Chain Partners**”) in line with operating requirements and BEAPWater shall not be held liable for use of the data or information for business purposes.

Information We May Collect

1. BEAPWater shall be at liberty to obtain and use the following information related to you or your use of our products, solutions and services:
 - Information from or about you
 - Information from or about your AWG
 - Information from or about your AWG performance
2. BEAPWater may not request all the above information from you as its requests for information shall be dependent on the BEAPWater products, solutions and services you request, own, or use.

When You Interact With Us Before Purchase

1. When you visit BEAPWater’s website, stores and galleries or attend a BEAPWater event or take BEAPWater’s surveys or sign-up for a free or paid pilot program or contact us with questions or for product information (in person, online, telephone, and email), you give your consent to BEAPWater to collect a variety of information from or about you, your location, water consumption, current water expense and budget, current water generating equipment and infrastructure, or from third parties. Such data includes the following:

Categories of Data	Description	Purpose and Legal Basis
Contact Information	Your name, address, region, email, phone number, contact preference	To communicate with you, process your request, and provide products or services, based on consent or our contract with you
Communications or interactions	Your requests for information, calls, emails, or in person communications, tours, newsletter, BEAPWater events, non BEAPWater events and pilot programs	To communicate with you, confirm eligibility, and provide products or services based on consent or our contract with you
Network and hardware activity information	Your current water generating equipment and infrastructure type, model, supplier, maintenance and usage culture, operating system, region, IP address, pixel tags, cookies	Optimize website and app performance, based on either your consent, our contract with you and/or our legitimate interests in improving user experience and security Recommend appropriate solution and product that meets your expectation

- information about you may also be received from sources such as public databases, joint marketing partners, certified installers, affiliates and business partners, and social media platforms for the purposes of providing you services related to your AWG.

Cookies and other similar technologies:

- Cookies are pieces of information stored directly on the computer that you are using and when you visit BEAPWater website, essentially cookies may be used
 - to provide you with a service requested by you;
 - when it is necessary for the functioning of BEAPWater website; and
 - where the placement of such cookies does not require user consent such as analytics and marketing cookies or other cookies.

When You are a BEAPWater Customer

- As a BEAPWater product or service owner (Customer), BEAPWater shall, when it deems necessary and at its absolute discretion obtain and use other information from you or third parties about or related to you, your AWG, water solution, service and product.
- BEAPWater shall also be at liberty to obtain and use other information relating to its products and services either through remote access or in person (for example, during a service appointment with our Value Chain Partners or direct employees and representatives.

BEAPWater Account

1. Customers who purchase or use BEAPWater products, solutions or services will also create a BEAPWater Account or have an account created for them by BEAPWater in the BEAPWater app or hoisted on our website.
2. You can access your BEAPWater Account to update the information from or about you in that account at any time. Customer's account shall contain the following information :
 - The status of your order
 - Your customer registration information
 - Warranty and other documentation for your AWG products
 - Usage history
 - Payment method information
 - Other general information about your BEAPWater products (for example product serial numbers, service plan information, or connectivity package), insurance forms, financing agreements, and similar information.

Information from or about you

Categories of Data	Description	Purpose and Legal Basis
Order information	Your purchase details, order agreement, trade-in or swap information, and other pre-delivery documents such as driver's license or government identification	To fulfill your request for products and services based on our contract with you
Financial information	Your payment method, bank account number, credit card details, financing, lease, or credit application information	To process your payment for the product or service purchased based on our contract with you
Customer support activity	Customer interactions, date, resolutions, towing services, Roadside Assistance	To provide customer service and technical support based on our contract with you and our legitimate interests regarding customer satisfaction

Information from or about your AWG

Categories of Data	Description	Purpose and Legal Basis
AWG type	AWG year, make, model, serial number, configuration etc	To fulfill your request for products and services based on our contract with you
AWG data	Data regarding performance, usage, operation, and health of your AWG	To provide you with services, maintenance (including remote AWG diagnostics and support), and improve your AWG over time based on either your consent, our contract with you, or our legitimate interests in ensuring the safety, security and

Categories of Data	Description	Purpose and Legal Basis
Back-up information	Back-up power source used, utilization, performance rate, battery analytics and performance	improvement of our products, solutions and services. To fulfill your request for services based on our contract with you, improve operational performance of the system based on our legitimate interests
Diagnostic data	Logs for identifying and troubleshooting unexpected software or connectivity issues, and other debugging log reports	To triage and fix software or product issues (including remote AWG diagnostics and support) based either on our contract with you, or our legitimate interests to ensure the safety, security and improvement of our products
BEAPWater mobile app information	Analytics regarding mobile app usage such as function successfully or unsuccessfully loaded	To ensure reliability of the app, and perform maintenance, based on our legitimate interests in improving user experience and the security and stability of our services
BEAPWater service and repair history	Service facility, date, mileage, repairs conducted, estimate and cost, parts details, and other similar information	To provide service and repairs based on our contract with you, reporting, improve quality and cost in line with our legitimate interests to improve internal business processes

Information from or about your AWG Composite products

Categories of Data	Description	Purpose and Legal Basis
Energy installation data	Home details, such as dimensions of your roof, electric system configuration, existing solar capacity, installation date, and energy serial number	To fulfill your request for products and services based on our contract with you
Energy product data	Data regarding performance, usage, operation, battery efficiency, and condition of your energy product	To provide you with services, security of functionality, and improve our products over time based on our legitimate interests
Energy diagnostic logs	Logs for identifying and troubleshooting unexpected software or connectivity issues, and other debugging log reports	To triage and fix software or product issues (including remote AWG or energy systems diagnostics and support) based on our legitimate interests in ensuring product safety and performance

There are two categories of data generated by your AWG: AWG Data and Diagnostic Data.

1. **AWG Data**

In order to support your AWG's continuous performance, predictive maintenance, and improved functionality and experience, your BEAPWater collects and processes AWG data related to the usage, operation, and condition of your AWG which shall be used to triage and fix potential issues, and continuously improve your AWG and services to you.

2. AWG data to be obtained include: location data, water consumption readings, frequency of usage, AWG component signals, back-up power performance readings, energy consumption readings (where applicable), internet connectivity status, battery use management information, battery charging history, electrical system functions and software version information.

Service history: In order to facilitate the service and repair of your AWG, we may collect and process data about the service history from our Value Chain Partners or service centres. This includes information such as name, serial number, repair history, parts details, estimate and costs, outstanding recalls, bills due, customer complaints, and any other information related to the AWG's service history.

3. **Diagnostic Data**

BEAPWater uses diagnostic logs to keep our products and services up to date, troubleshoot or debug problems, and make continuous improvements. We aim to collect the minimum level of diagnostic data necessary to help keep your AWG or associated energy product reliable, secure, and operating normally. Diagnostics may include details about AWG configuration, firmware, energy use, electronic systems state, and other system-to-system data used to identify bugs and conduct technical evaluations. On specific events, we use diagnostic logs as basic error information to help determine whether the problems experienced can be addressed by an immediate or future software release.

How We May Use Your Information

1. BEAPWater shall use the information obtained from you to:
- Communicate with you
 - Fulfill our products, solutions and services
 - Improve and enhance development of our products, solutions and services
2. BEAPWater may contact you to advise you of important safety-related information and to present products, solutions, services and offers tailored to you, or to respond to your inquiries and fulfill your requests for product information, BEAPWater Updates, and other events.
3. When you contact BEAPWater for information or make a purchase, BEAPWater may use the data received from you toward delivering the most seamless AWG and energy services, including the following:

(a) **Communicate with you**

- To respond to your inquiries and fulfill your requests
- To offer you information on contests, events, and promotions and to administer these activities
- To share administrative information with you, such as changes to our terms, conditions, and policies
- For educational and awareness purposes on topics that interest you

- To advise you of important safety-related information about your AWG or energy product
- To conduct research, surveys, and obtain your feedback

(b) Fulfill our products, solutions and services

- To complete your purchase, request for product leasing or financing, and have your order installed or delivered to you
- To process your payment for a product, solution or service
- To process, assist and provide related customer support
- To monitor your BEAPWater product's performance and provide related services, including updates
- To understand, triage, and fix issues or concerns with products and services

(c) Improve and enhance development of our products, solutions and services

- To conduct research, develop and promote new products and services, and to improve or modify our existing services
- To analyze and improve the safety and security of our products, solutions and services
- For business purposes such as data analytics, audits, fraud monitoring and prevention, business planning, determining effectiveness of campaigns, reporting, and forecasting

(d) Other circumstances

- To fulfill contractual obligations with third parties, agents and affiliates
- To analyze, reconstruct, investigate or otherwise determine the cause of an AWG-related incident or accident
- To comply with legal obligations, law enforcement, and other government requests
- To establish, exercise, or defend legal claims
- As otherwise permitted or directed by you

4. BEAPWater retains personal data for as long as necessary to fulfill the purposes for which it was collected as described herein

5. BEAPWater shall process and use personal data about you as required by law for the purposes of providing the products, solutions or services you use; operating BEAPWater's businesses, and protecting the security of BEAPWater's systems, products and customers..

6. BEAPWater shall disclose and shall not incur any liability for disclosing information about you which is required by government authorities, institutions and law enforcement agencies.

7. BEAPWater shall be at liberty to share information about you to enforce its Terms of Use or protect its operations or customers or for the purposes of reorganization, merger, change of control, or sale .

Collection and Use of Non-Personal Data

1. BEAPWater may also collect, use, and share information that does not, on its own, personally identify you for operational or research purposes or industry analysis or to improve or modify its products and services or to better tailor its products and services to your needs..

2. BEAPWater does not transfer or sell your personal data to anyone for any purpose.

BEAPWater uses your personal data with its service providers, business partners, joint venture partners, contractors, sub-contractors, subsidiaries, sister and related companies and affiliates entities as described in the table below:

Categories of Recipients	Description	Reason for Sharing
Value Chain Partners, affiliates and subsidiaries	Companies that are owned or controlled by BEAPCapital, or where we have a substantial ownership interest	To assist, operate, enhance, and fulfill services on our behalf based on our legitimate interests to outsource certain operations
Service providers and business partners	Companies we've hired to provide services like customer support, product financing, repair estimate providers, infrastructure, and other professional service providers	To assist, operate, and fulfill services on our behalf based on our legitimate interests to outsource certain operations
Payment processors	Companies we contract with to securely process your payment details	To enable payment processing based on our contract with you, and fraud prevention in line with our legitimate interests

Third parties you authorize

Categories of Recipients	Description	Reason for Sharing
Financial institutions/ Our Finance Partners	Companies that process credit applications for lease and financing offerings	To confirm your eligibility, and process your request for service based on your consent or our contract with you
Energy utilities and energy services companies	Companies that deploy and distribute energy to your home from the grid	To fulfill your request for Energy products and services based either on your consent, our contract with you or pre-contractual arrangements requested by you
Certified energy installers	Partners who may perform financing, permitting, inspections and installations	To perform, assist, and fulfill services on either our behalf or yours based on your consent or our contract with you
Third party service and repair centers	Third party service locations we partner with to provide you with quality repair	To facilitate service and repairs, and improve costs and service based on our contract with you and our legitimate interests in improving costs and service

Other third parties as required by law or other circumstances

Categories of Recipients	Description	Reason for Sharing
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Categories of Recipients	Description	Reason for Sharing
Law enforcement and government authorities	Disclosure of information as required by law, or when otherwise appropriate	To comply with applicable laws based on our legal obligation or legitimate interests
Government-offered incentive or credit programs	Disclosure of information as required by the program	To comply with the participation terms of the offered program based on our legitimate interests

Choice and Transparency

BEAPWater may as it deems fit give you access to your data related to your BEAPWater Account through device permissions, in-app settings, communication preferences.

Rights and Choices

- 1. BEAPWater Updates** - By your request for information or purchase of a product, or signing up for promotional communications, you give your consent to BEAPWater to contact you by email, call, text, or via the BEAPWater app about promotions, our products and services, and other information that may be of interest to the services provided to you.
2. If you no longer want to receive promotional-related emails or messages, it is your obligation to opt out at any time by following the unsubscribe instructions in the communication received from us, by changing your communication preferences, or by telling us using any method from the Privacy Questions section.
3. If you receive a call or text from BEAPWater and do not want to receive similar calls in the future, or if you do not want to receive automated calls, simply ask to be placed on “do not call” list.
4. Note that BEAPWater may still be required to send you administrative or other important messages, such as billing notices or policy changes, even if you opt out of receiving other communications.

Data Privacy Requests:

1. Subject to local law and discretion of BEAPWater, you may be informed of, given access to the personal data BEAPWater process about you; update and correct inaccuracies in that information; have the information restricted or deleted; object or withdraw your consent to certain uses of data.
2. You may also request not to be subject to automated decision-making, including profiling, where it would have a legal or similarly significant effect on you
3. You can make the requests to BEAPWater in the following ways:
 - Submitting a data privacy request online – through our **Contact Us** link
 - Emailing us at beapwater@beapcapital.org
 - By accessing your BEAPWater Account to update your information at any time

4. BEAPWater may request for t more information from you so as to enable BEAPWater attend to your request or requests

5. . You may at any time refer your complaint to the relevant regulator in your jurisdiction if you are unsatisfied with a reply received from BEAPWater.

Updates to this Notice

1. This Notice sets out the essential details relating to your personal data relationship with BEAPWater.
2. From time to time, BEAPWater may develop new capabilities, features, or offer additional services which may require or lead to material changes to this Notice and same shall be duly communicated to you as further notices and updates and becomes effective when we post it on our website.

Privacy Questions

For privacy questions or comments, to opt out from certain services, or to submit a data privacy request, please **contact us**.

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