

SHAMBA DIRECT LIMITED

PRIVACY POLICY

Version: 2.0

Effective Date: 18/08/2026

INTRODUCTION, SCOPE & INFORMATION WE COLLECT

1. Introduction

Shamba Direct Limited (“**Shamba Direct**”, “**we**”, “**us**” or “**our**”) respects the privacy and personal data of farmers, sellers, buyers, customers, service providers and other persons who interact with Shamba Direct (“**User**”, “**you**” or “**your**”).

This Privacy Policy explains how Shamba Direct collects, uses, stores, shares and protects personal data when you access or use our website, applications, digital marketplace and related services (collectively, the “**Platform**”).

We process personal data in accordance with applicable laws of the **United Republic of Tanzania**.

This Privacy Policy should be read together with our **Terms and Conditions** and other policies applicable to the Services you use.

2. Scope of This Policy

This Policy applies to personal data collected when you:

- I. create or use a Shamba Direct account;
- II. buy, sell or list Products;
- III. place or fulfil an Order;
- IV. make or receive payments through supported services;
- V. request delivery or logistics support;
- VI. communicate with Shamba Direct;
- VII. participate in Shamba Direct programmes or services; or
- VIII. otherwise interact with the Platform.

Where a particular programme or Service requires additional processing of personal data, Shamba Direct may provide a separate or supplementary privacy notice.

3. Personal Data We Collect

We collect only personal data that is reasonably necessary for our Services, transactions, security, legal compliance and legitimate business operations.

Depending on your interaction with Shamba Direct, we may collect:

a. Personal and Contact Information

1. full name;
2. telephone number;
3. email address;
4. physical or delivery address; and
5. identification information where reasonably required.

b. Farmer, Seller and Business Information

- I. farm or business name;
- II. business registration or verification information;
- III. farm or business location;
- IV. Products, quantities and prices;
- V. licences, permits or certifications where applicable; and
- VI. other information necessary to provide marketplace services.

c. Transaction Information

- I. Orders and Products purchased or supplied;
- II. quantities and prices;
- III. transaction dates;
- IV. delivery information;
- V. payment method and status;
- VI. transaction references; and
- VII. refund, complaint or dispute information.

d. Technical and Platform Information

- I. IP address;
- II. device and browser information;
- III. login and Platform activity;
- IV. access times;
- V. technical logs; and
- VI. security-related information.

4. Payment Information

Payments may be processed through independent authorized payment providers, banks or mobile-money services.

Shamba Direct may receive limited transaction information necessary to **confirm, reconcile, refund or investigate payments**, including payment amount, transaction reference, payment status, telephone number and transaction date.

Shamba Direct does **not intentionally collect or store mobile-money PINs, card PINs, passwords, OTPs or other confidential payment authentication credentials**.

Users must never disclose such credentials to Shamba Direct employees, Sellers, Buyers or other third parties.

5. Information Provided by Users

Users are responsible for ensuring that personal data they provide to Shamba Direct is accurate and, where it relates to another person, that they have lawful authority to provide it.

Users should not provide personal data that is unnecessary for the relevant transaction or Service.

Shamba Direct may request additional information where reasonably necessary for **identity verification, fraud prevention, transaction security, regulatory compliance or provision of Services**.

HOW WE USE PERSONAL DATA

6. How We Use Your Information

Shamba Direct processes personal data only for **legitimate, lawful and reasonably necessary purposes** connected with our operations and Services.

We may use personal data to:

a. Provide and Manage Services

- i. create and manage User accounts;
- ii. connect Farmers, Sellers and Buyers;
- iii. process and manage Orders;
- iv. facilitate marketplace transactions;
- v. coordinate deliveries and logistics;
- vi. facilitate payments and Seller settlements; and
- vii. provide customer support.

b. Verify Users and Transactions

- i. verify identity or business information;
- ii. confirm transaction details;
- iii. conduct reasonable compliance checks; and

- iv. maintain the integrity of the Platform.

Verification by Shamba Direct does not constitute a guarantee or endorsement of any User.

7. Security and Fraud Prevention

We may process personal data where reasonably necessary to:

- i. detect and prevent fraud;
- ii. identify suspicious transactions;
- iii. prevent unauthorized account access;
- iv. investigate misuse of the Platform;
- v. protect Users and Shamba Direct;
- vi. maintain Platform security; and
- vii. enforce our Terms and Conditions.

Where reasonably necessary and permitted by law, Shamba Direct may restrict an account or transaction while investigating suspected fraud, security threats or unlawful activity.

8. Legal and Regulatory Compliance

Shamba Direct may process, retain or disclose personal data where reasonably necessary to:

- a. complies with applicable laws and regulatory requirements;
- b. respond to lawful requests from competent authorities;
- c. maintain required business, tax or transaction records;
- d. investigate and resolve complaints or disputes;
- e. establish, exercise or defend legal claims; or
- f. protect the legal rights and legitimate interests of Shamba Direct or its Users.

9. Improving Our Services

We may use appropriate Platform, transaction and technical information to:

- i. monitor Platform performance;
- ii. understand how Users interact with our Services;
- iii. improve functionality and customer experience;
- iv. develop new Products or Services;
- v. identify operational problems; and
- vi. support business planning and analytics.

Where reasonably possible and appropriate, aggregated or anonymised information may be used for analysis and business improvement without directly identifying individual Users.

10. Communications

Shamba Direct may use contact information to send necessary communications relating to:

- i. Orders and transactions;
- ii. payments and settlements;
- iii. deliveries;
- iv. account administration;
- v. security alerts;
- vi. customer support; and
- vii. important changes to our Services or policies.

Where permitted by law, Shamba Direct may also send information about Products, agricultural opportunities, promotions or other Services.

Where consent is legally required for promotional communications, appropriate consent will be obtained. Users may withdraw marketing consent or unsubscribe through available channels.

Withdrawal from marketing communications does not prevent Shamba Direct from sending necessary **transactional, security, legal or account-related communications**.

11. Lawful Processing

Shamba Direct will process personal data only where there is an appropriate lawful basis under applicable Tanzanian law, including where processing is necessary to:

- i. provide requested Services or perform contractual obligations;
- ii. comply with a legal obligation;
- iii. pursue a legitimate and lawful business purpose;
- iv. protect appropriate legal interests; or
- v. act on valid consent where consent is required.

Where processing is based on consent, Users may withdraw that consent in accordance with applicable law, without affecting processing lawfully carried out before withdrawal.

DATA SHARING, THIRD-PARTY SERVICES & INTERNATIONAL PROCESSING

12. When We Share Personal Data

Shamba Direct does **not sell Users' personal data as a business practice**.

We may share personal data only where reasonably necessary to provide our Services, complete transactions, protect the Platform or comply with applicable law.

Personal data may be shared with:

a. Buyers and Sellers

Information necessary to complete a transaction, such as name, contact details, Order information and relevant delivery details.

b. Payment Providers

Transaction information necessary to process, verify, reconcile, reverse or refund payments.

c. Delivery and Logistics Providers

Information reasonably required to collect, transport or deliver Products, including recipient details and delivery location.

d. Technology and Service Providers

Trusted providers supporting hosting, cloud infrastructure, communications, authentication, security, analytics and technical operations.

e. Professional Advisers

Lawyers, accountants, auditors and other professional advisers where access is reasonably necessary for legitimate business or legal purposes.

f. Government and Regulatory Authorities

Information may be disclosed where required or permitted by applicable law, court order, regulatory requirement or other lawful request from a competent authority.

Shamba Direct will seek to limit disclosure to information reasonably necessary for the relevant purpose.

13. Marketplace Data Sharing

Because Shamba Direct connects Farmers, Sellers and Buyers, certain information must be shared between transaction participants.

For example, a Seller or delivery provider may receive a Buyer's:

- i. name;
- ii. telephone number;
- iii. delivery location; and
- iv. relevant Order information.

Similarly, a Buyer may receive relevant Seller or Product information necessary to complete the transaction.

Users must use information received through Shamba Direct **only for the legitimate transaction or purpose for which it was provided** and must not unlawfully misuse, disclose or commercially exploit another User's personal data.

14. Third-Party Service Providers

Shamba Direct may use independent payment providers, banks, mobile-network operators, logistics companies, cloud providers and other technology or business-service providers.

Where such providers process personal data on behalf of Shamba Direct, we will take reasonable steps to use providers capable of handling such data appropriately and, where required, put suitable contractual or data-protection arrangements in place.

Where a third party independently determines how it processes personal data, its own privacy terms and legal obligations may apply.

Shamba Direct is not responsible for independent processing or conduct of third parties outside its reasonable control, except where responsibility cannot lawfully be excluded.

15. International Data Processing

Some technology or service providers may use systems or infrastructure located outside Tanzania.

Where personal data is transferred or processed outside Tanzania, Shamba Direct will take reasonable measures required by applicable Tanzanian data-protection law to protect such information.

16. Legal, Security and Business Disclosures

Shamba Direct may disclose relevant personal data where reasonably necessary to:

- i. prevent or investigate fraud or unlawful activity;
- ii. protect the safety, rights or property of Shamba Direct or its Users;
- iii. enforce contractual rights;
- iv. establish or defend legal claims; or
- v. comply with lawful regulatory or judicial requirements.

Where Shamba Direct undergoes a lawful merger, acquisition, restructuring, financing or transfer of all or part of its business, relevant personal data may be transferred as part of that transaction, subject to applicable data-protection requirements.

17. User-Generated and Public Information

Users may voluntarily publish Product listings, business information, photographs, reviews, ratings or other content through the Platform.

Information intentionally made public through a listing or profile may be visible to other Users.

Users are responsible for ensuring that content they submit does not unlawfully disclose another person's personal data or violate third-party rights.

Shamba Direct may remove or restrict content that violates applicable law, this Privacy Policy or our Terms and Conditions.

DATA SECURITY, RETENTION & YOUR PRIVACY RIGHTS

18. Data Security

Shamba Direct takes reasonable **technical and organisational measures** to protect personal data against:

- i. unauthorized access or disclosure;
- ii. loss, misuse or alteration;
- iii. unauthorized processing; and
- iv. accidental or unlawful destruction.

Security measures may include access controls, authentication, restricted administrative access, secure communications, system monitoring and other safeguards appropriate to the nature of the information processed.

However, no internet, mobile or electronic system can be guaranteed to be completely secure. Shamba Direct therefore does not guarantee absolute security of information transmitted or stored through the Platform.

19. User Account Security

Users are responsible for taking reasonable steps to protect their accounts, devices and login credentials.

Users should:

- i. use secure passwords;
- ii. keep passwords, PINs and OTPs confidential;
- iii. protect devices used to access Shamba Direct; and
- iv. promptly notify Shamba Direct of suspected unauthorized access or account misuse.

Shamba Direct will not intentionally request a User's password, mobile-money PIN or OTP through unsolicited communications.

20. Personal Data and Security Incidents

Where Shamba Direct becomes aware of a suspected personal-data breach or material security incident, we may take reasonable steps to:

- a. investigates the incident;
- b. contains or reduce its impact;
- c. protects affected systems and information;
- d. maintains appropriate incident records; and
- e. notifies affected persons or competent authorities where required by applicable law.

Users must reasonably cooperate where an incident involves their account, device or information under their control.

21. Data Retention

Shamba Direct retains personal data only for as long as reasonably necessary for the purpose for which it was collected or where retention is required or permitted by law.

Information may be retained for purposes including:

- i. providing Services;
- ii. transaction and payment records;
- iii. accounting and tax requirements;
- iv. fraud prevention and security;
- v. complaints and dispute resolution;
- vi. enforcement of agreements; and
- vii. legal or regulatory compliance.

When personal data is no longer reasonably required, Shamba Direct may securely delete, anonymise or otherwise dispose of it in accordance with applicable requirements.

Closing an account does not automatically require deletion of information that Shamba Direct is legally entitled or required to retain.

22. Your Privacy Rights

Subject to applicable Tanzanian law, a User may have the right to:

- i. request access to personal data held about them;
- ii. request correction of inaccurate or incomplete data;
- iii. request deletion where legally applicable;
- iv. object to certain processing;
- v. request restriction of certain processing;
- vi. withdraw consent where processing is based on consent; and
- vii. submit a complaint concerning the handling of personal data.

These rights may be subject to lawful limitations, including where Shamba Direct must retain or process information for contractual, legal, regulatory, security or dispute-resolution purposes.

23. Privacy Requests and Identity Verification

Users may submit privacy requests through Shamba Direct's designated privacy contact.

Before granting access, correction, deletion or another privacy request, Shamba Direct may request reasonable information to **verify the identity and authority of the person making the request**.

This verification is intended to prevent unauthorized access, fraudulent deletion or disclosure of another person's personal data.

Privacy Email: shambadirecttz@gmail.com

Telephone: +255 750 586 178

Address: Arusha, Tanzania

Shamba Direct will consider and respond to valid privacy requests in accordance with applicable legal requirements.

COOKIES, CHILDREN, POLICY UPDATES & CONTACT INFORMATION

24. Cookies and Similar Technologies

Shamba Direct may use cookies and similar technologies to operate and improve the Platform, including to:

- i. maintain User sessions;
- ii. remember preferences;
- iii. support authentication and security;
- iv. understand Platform usage; and
- v. improve functionality and User experience.

Users may manage cookies through their browser or device settings. Disabling essential cookies may affect the functionality of certain Platform features.

Where consent is required by applicable law for particular cookies or similar technologies, Shamba Direct will provide an appropriate consent mechanism.

25. Children's Privacy

Shamba Direct Services involving commercial transactions or account registration are generally intended for persons who have the legal capacity to use those Services.

Shamba Direct does not knowingly collect or process children's personal data in circumstances prohibited by applicable law.

Where Shamba Direct operates a programme, initiative or Service involving children or minors, Shamba Direct may apply additional safeguards, privacy notices, age-verification measures and **parental or guardian consent** where required by applicable law.

26. External Links and Services

The Platform may contain links to websites, applications or services operated independently by third parties.

Shamba Direct does not control the privacy practices of independent third parties. Users should review the applicable privacy policies before providing personal data through an external service.

27. Changes to This Privacy Policy

Shamba Direct may update this Privacy Policy from time to time to reflect changes in:

- I. applicable laws or regulations;
- II. our Services or business operations;
- III. technology and security requirements; or
- IV. our data-processing practices.

The updated Policy will display a revised **Effective Date or Last Updated date**.

Where required by law or appropriate because of a material change, Shamba Direct will provide reasonable additional notice.

28. Relationship With Other Shamba Direct Policies

This Privacy Policy should be read together with other applicable Shamba Direct legal documents, including:

- I. **Terms and Conditions;**
- II. **Refund & Cancellation Policy;**
- III. **Seller/Farmer Terms;**
- IV. **Payment & Settlement Terms;**
- V. **Delivery & Logistics Terms;** and
- VI. **Cookie Policy**, where applicable.

Where a particular programme or Service involves additional categories or uses of personal data, Shamba Direct may issue a supplementary privacy notice applicable to that programme or Service.

29. Privacy Complaints

A User who believes that Shamba Direct has improperly handled their personal data should contact Shamba Direct using the details below so that the matter can be investigated.

Nothing in this Policy prevents a User from exercising any right to lodge a complaint with a **competent data-protection or regulatory authority in Tanzania** where such right exists under applicable law.

30. Contact Information

Questions, requests or complaints regarding this Privacy Policy or Shamba Direct's handling of personal data may be directed to:

SHAMBA DIRECT LIMITED

Registered Office: P.O. Box 2798, Arusha

Physical Address: Arusha, Tanzania

Postal Address: P.O Box 2798, Arusha, Tanzania

General Email: shambadirecttz@gmail.com

Telephone: +255 750 586 178

Website: shambadirect.co.tz

31. Governing Framework

This Privacy Policy shall be interpreted and applied in accordance with the applicable laws of the **United Republic of Tanzania**.

Nothing in this Policy is intended to exclude, restrict or waive any privacy or data-protection right, obligation or remedy that cannot lawfully be excluded or restricted.