CLIMB UP LIMITED

PRIVACY POLICY

Effective Date: 6 October 2026
Last Updated: 6 October 2026

55 Ally Sykes Road, Kawe Beach, Kinondoni, Dar es Salaam, Tanzania
info@climbup.co.tz | +255 652 433 633 / +255 739 633 433
https://www.climbup.co.tz

1. Introduction

Climb Up Limited ("Climb Up", "we", "us", or "our") is a technology and digital solutions company providing innovative ICT platforms and services to businesses, agricultural organisations, cooperatives, utilities, government and non-governmental organisations, and other customers.

Our services include agricultural and agribusiness platforms, enterprise resource planning systems, digital traceability solutions, RFID and biometric systems, prepaid water metering solutions, mobile and web applications, data management platforms, system integrations and other customised technology solutions.

This Privacy Policy explains how Climb Up Limited collects, uses, stores, protects, and may disclose personal information when individuals interact with our websites, applications, digital platforms, services, payment facilities and related technology solutions.

We are committed to protecting personal information and handling it responsibly in accordance with applicable laws of the United Republic of Tanzania, including the Personal Data Protection Act, 2022 and applicable regulations.

2. Information We Collect

Depending on the service being used, we may collect personal information such as full name, telephone number, email address, physical or postal address, identification information where required, organisation or company information, user account information, login and authentication information, and information provided when contacting our support team.

When customers make payments through our platforms, we may process information necessary to identify and reconcile the transaction, including customer or account reference, invoice or payment reference, amount paid, transaction date and time, payment status, payment method, payment transaction/reference number, and relevant merchant or service information.

Where payments are processed through third-party payment service providers such as AzamPay, payment credentials such as card PINs, mobile-money PINs and other confidential authentication credentials are not intentionally collected or stored by Climb Up unless expressly required and lawfully permitted for a particular service.

We may also collect technical information such as IP address, browser type, device type, operating system, application version, access dates and times, log information, system performance information, and security and authentication logs.

Our platforms may process information relating to farmers, cooperative members, utility customers, employees, beneficiaries, suppliers, customers and other authorised users depending on the specific service being provided.

3. How We Use Personal Information

We may use personal information to:

- Provide and operate our products and services;
- Create and manage user accounts;
- Process and reconcile payments;
- Provide receipts, confirmations and transaction notifications;
- Provide customer support;
- Verify transactions and prevent fraud or unauthorised activity;
- Maintain security and system integrity;
- Improve our products, platforms and services;
- Perform analytics and generate operational reports;
- Communicate with customers regarding their accounts or services;
- Meet contractual, regulatory and legal obligations;
- Resolve complaints, disputes and payment issues;
- Maintain appropriate business and financial records; and
- Perform other purposes communicated at the time information is collected.

4. Payment Processing

Climb Up may integrate third-party payment service providers to enable customers to make payments electronically.

Where a customer chooses to make a payment through a third-party provider, relevant transaction information may be shared with or received from the payment provider for payment initiation, authentication, processing, confirmation, reconciliation, refund processing, fraud prevention and transaction reporting.

Payment providers may have their own privacy policies and terms governing the processing of payment information.

5. Legal Basis for Processing

We process personal information only where there is an appropriate lawful basis, which may include consent; performance of a contract or provision of a requested service; compliance with a legal or regulatory obligation; protection of legitimate interests where permitted by law; prevention, detection and investigation of fraud or security incidents; or other lawful grounds recognised under applicable Tanzanian law.

6. Sharing of Personal Information

We may share personal information where reasonably necessary with payment service providers; banks and financial institutions involved in transactions; technology and cloud-service providers; hosting and infrastructure providers; SMS, email and communication service providers; professional advisers and auditors; government authorities and regulators where legally required; clients or organisations that are

authorised data controllers for a particular project; and other service providers acting on our behalf under appropriate contractual or confidentiality obligations.

We do not sell personal information to third parties.

7. Data Security

Climb Up takes reasonable technical and organisational measures to protect personal information against unauthorised access, unauthorised disclosure, loss, misuse, alteration, destruction and other unlawful or unauthorised processing.

Security measures may include access controls, authentication mechanisms, encryption where appropriate, system monitoring, backups, logging, role-based access controls and other measures appropriate to the nature of the information and service.

However, no internet-based system can be guaranteed to be completely secure.

8. Data Retention

We retain personal information only for as long as reasonably necessary for the purpose for which it was collected, including to provide the requested service, maintain business and transaction records, meet contractual obligations, meet legal, accounting, tax or regulatory requirements, resolve disputes, and prevent fraud and maintain security.

When information is no longer required, it may be securely deleted, anonymised or otherwise disposed of in accordance with applicable requirements.

9. User Rights

Subject to applicable law, individuals may have rights relating to their personal information, including the right to know how their personal information is being processed; request access to personal information held about them; request correction of inaccurate or incomplete information; request deletion where legally applicable; object to or restrict certain processing; withdraw consent where processing is based on consent; and raise a complaint concerning the handling of personal information.

Requests may be submitted to info@climbup.co.tz. We may need to verify the identity of the person making a request before responding.

10. Cookies and Similar Technologies

Our websites and applications may use cookies or similar technologies to improve functionality, security, analytics and user experience. Users may be able to control certain cookies through their browser settings. Disabling certain cookies may affect some website functionality.

11. Third-Party Services

Our websites, applications and platforms may contain integrations with third-party services, including payment processors, communication services, mapping services, hosting providers, analytics services and other technology providers. Third parties may process information according to their own applicable terms and privacy policies.

12. Children's Privacy

Our services are primarily intended for organisations, businesses, adults and authorised users.

Where our technology platforms process information relating to children as part of an authorised project, school, agricultural, government or other programme, such information will be processed only for legitimate and authorised purposes and with appropriate safeguards.

13. International Data Transfers

Where technology infrastructure or service providers require information to be processed outside Tanzania, Climb Up will take reasonable steps to ensure that such processing and transfer is carried out in accordance with applicable data protection requirements.

14. Data Breaches and Security Incidents

Where a personal data breach or security incident occurs, Climb Up will take reasonable steps to investigate, contain and mitigate the incident and make any notifications required by applicable law or regulatory requirements.

15. Complaints

Customers and individuals who have concerns regarding privacy, personal information or the handling of their data should first contact Climb Up Limited at info@climbup.co.tz or +255 652 433 633 / +255 739 633 433. We will review and respond to complaints within a reasonable period. Where a complaint cannot be resolved directly, individuals may exercise any further rights available under applicable Tanzanian law.

16. Changes to this Privacy Policy

Climb Up may update this Privacy Policy from time to time to reflect changes in our services, technology, legal requirements or business practices. The latest version will be made available through our website or relevant application.

17. Contact Us

Climb Up Limited

55 Ally Sykes Road, Kawe Beach, Kinondoni, Dar es Salaam, Tanzania

Email: info@climbup.co.tz

Phone: +255 652 433 633 / +255 739 633 433

Website: https://www.climbup.co.tz

Document Approval

This document is approved for publication and use by Climb Up Limited.

Authorised Representative	

Signature	
Date	