

TROO Privacy Policy.

Last Updated: 12th Aug, 2025.

Privacy Policy

This Privacy Policy explains how **TROO** (“TROO”, “we”, “us”, or “our”) collects, uses, stores, discloses, and protects personal information when you use our website, applications, software, hardware, products, and services (collectively, the “**TROO Services**”).

This Privacy Policy applies to personal information collected from merchants, their employees and authorised users, customers of merchants, website visitors, prospective customers, business partners, and other individuals who interact with **TROO**.

By using the TROO Services, you acknowledge that you have read and understood this Privacy Policy.

Where a specific TROO product or service has an additional privacy notice, that notice may apply alongside this Privacy Policy.

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1. Personal Information We Collect

We collect personal information from individuals in different ways depending on how they interact with TROO and the Services.

Information You Provide Directly

We may collect information that you provide to us when you:

- create or manage a TROO account;
- register your business;
- subscribe to or use our products and services;
- contact our sales or support teams;
- participate in a TROO trial, evaluation, or other programme;
- complete forms on our website;
- communicate with us by email, telephone, social media, or other channels; or
- provide feedback about TROO.

This information may include:

- Full name;
- Business name and business contact details;
- Email address;
- Telephone number;
- Business address;
- Job title or role;
- Username and account information;
- Login credentials;
- Information about your business;
- Information provided during onboarding;
- Customer support and correspondence records;
- Feedback and survey responses; and
- Other information you choose to provide to us.

Business and Transaction Information

When you or your business uses TROO, we may collect information relating to your business operations, including:

- Merchant account information;
- Products and services offered;
- Menu and catalogue information;
- Pricing information;
- Sales and order information;
- Transaction amounts and transaction history;
- Refund and cancellation information;
- Staff and user activity;
- Inventory information;
- Customer loyalty information;
- Business performance information; and

- Other information generated through your use of the TROO Services.

Customer Information

Where a merchant uses TROO to manage customer orders, loyalty, payments, or other customer-facing services, TROO may process information about the merchant's customers.

This may include:

- Name;
- Telephone number;
- Email address;
- Order history;
- Transaction information;
- Loyalty or rewards information;
- Preferences provided by the customer;
- Feedback; and
- Other information is provided through the merchant's use of TROO.

Where a merchant provides us with personal information relating to its customers or other individuals, the merchant is responsible for ensuring that it has the appropriate legal basis, permissions, and notices required to provide that information to TROO.

Device and Technical Information

When you access or use TROO, we may automatically collect technical information about the device or system used to access the Services, including:

- Device type and model;
- Operating system;
- Browser type;
- IP address;
- Device identifiers;
- Application version;
- Network information;
- Log information;
- Date and time of access;
- Pages, screens, or features accessed; and
- Information about how you interact with the Services.

Information Collected Through Cookies and Similar Technologies

We may use cookies, pixels, tags, web beacons, software development kits, and similar technologies to collect information about how you use our website and Services.

These technologies may help us understand how visitors use our website, remember preferences, improve functionality, measure performance, and support our marketing activities.

2. How We Use Your Personal Information

We may use personal information for the following purposes:

Providing and Managing the TROO Services

We use information to:

- Create and manage accounts;
- Provide access to TROO products and services;
- Process and manage transactions;
- Provide order and inventory functionality;
- Support business operations;
- Configure and maintain TROO hardware and software;
- Provide customer support;
- Communicate with merchants and users;
- Monitor and maintain service performance; and
- Fulfil our contractual obligations.

Improving TROO

We may use information to:

- Understand how merchants use TROO;
- Identify problems and improve functionality;
- Develop new products and features;
- Test and evaluate new functionality;
- Conduct research and analysis;
- Monitor product performance; and
- Improve the overall user experience.

Analytics and Reporting

We may analyse information generated through the TROO Services to understand business and product trends, measure performance, generate reports, and improve our products.

Where appropriate, we may use aggregated, anonymised, or de-identified information for these purposes.

Security and Fraud Prevention

We may use information to:

- Detect and prevent fraud;
- Protect accounts and systems;
- Investigate suspicious activity;
- Maintain the security of the TROO Services;
- Prevent misuse; and
- Protect TROO, our merchants, users, and other individuals.

Marketing

Where permitted by applicable law, we may use your information to communicate with you about TROO products, services, events, offers, updates, and other information that may be relevant to you.

You may opt out of marketing communications at any time by using the unsubscribe option included in our marketing communications or by contacting us.

You may continue to receive service-related communications even if you opt out of marketing communications.

Legal and Regulatory Compliance

We may process personal information where necessary to:

- Comply with applicable laws and regulations;
- Respond to lawful requests from government authorities;
- Enforce our agreements and Terms & Conditions;
- Protect our rights and property; and
- Investigate or prevent unlawful or harmful activity.

3. How We Share Your Personal Information

We may share personal information with the following categories of recipients where necessary for the purposes described in this Privacy Policy.

Service Providers

We may use third-party service providers to support our business and provide the TROO Services.

These may include providers of:

- Cloud hosting;
- Data storage;
- Analytics;
- Customer support;
- Communication services;
- Payment services;
- Security services;
- Software and technology infrastructure; and
- Other business support services.

Our service providers are expected to process personal information only for authorised purposes and in accordance with applicable privacy and security requirements.

Third-Party Integrations

TROO may integrate with third-party services selected or enabled by a Merchant.

Where you choose to connect TROO with a third-party service, information may be shared with that service as necessary to provide the requested functionality.

The third party's own privacy policy will govern its processing of information once it receives the information.

Business Partners

We may share information with business partners where necessary to provide services, support business relationships, or fulfil an agreement.

Legal and Regulatory Authorities

We may disclose personal information where required or permitted by law, including in response to lawful requests, court orders, regulatory requirements, or government investigations.

Business Transfers

If TROO is involved in a merger, acquisition, restructuring, financing, sale of assets, or similar transaction, personal information may be transferred as part of that transaction.

Where required by law, we will provide appropriate notice regarding such transfer.

With Your Consent

We may share personal information with other parties where you have provided appropriate consent or otherwise directed us to do so.

4. Your Rights and Choices

Depending on applicable law, you may have certain rights regarding your personal information.

These may include the right to:

- Request access to personal information we hold about you;
- Request correction of inaccurate or incomplete information;
- Request deletion of personal information in certain circumstances;
- Object to certain processing activities;
- Request restriction of processing in certain circumstances;
- Withdraw consent where processing is based on consent; and
- Request a copy of certain information in a portable format where applicable.

These rights are subject to applicable legal limitations and may not apply in every circumstance.

Marketing Communications

You may opt out of receiving marketing communications by clicking the unsubscribe link in our communications or contacting us.

Opting out of marketing communications will not prevent us from sending important service-related communications.

Providing Personal Information

You may choose not to provide certain personal information to us.

However, where information is necessary to provide a product or service, create an account, process a transaction, or fulfil a legal or contractual obligation, we may be unable to provide the relevant Service if you do not provide the required information.

Complaints

If you have concerns about how TROO handles your personal information, you may contact us using the details provided in the **Contact Us** section.

You may also have the right to lodge a complaint with the relevant data protection authority where applicable.

5. International Transfers

TROO and its service providers may process or store personal information in countries other than the country in which you are located.

Where personal information is transferred across borders, we will take reasonable steps to ensure that the transfer and processing are carried out in accordance with applicable data protection laws.

Where required by applicable law, we will use appropriate safeguards for international transfers of personal information.

6. How We Protect Your Information

We maintain reasonable technical, organisational, and administrative safeguards designed to protect personal information against accidental loss, unauthorised access, misuse, alteration, disclosure, or destruction.

These measures may include:

- Access controls;
- Authentication mechanisms;
- Encryption where appropriate;
- Monitoring and security controls;
- Secure data storage;
- Employee and contractor confidentiality obligations; and
- Procedures for responding to suspected security incidents.

However, no system or method of transmission over the internet can be guaranteed to be completely secure.

If we become aware of a personal data breach that requires notification under applicable law, we will take appropriate steps to investigate and notify affected parties and/or relevant authorities where legally required.

7. Third-Party Websites and Services

The TROO website or Services may contain links to third-party websites, applications, platforms, or services.

TROO is not responsible for the privacy practices, security, content, or policies of third-party websites or services.

We encourage you to review the privacy policy of any third-party service before providing personal information to it.

8. Data Retention

We retain personal information for as long as reasonably necessary for the purposes for which it was collected, including to provide our Services, maintain business records, comply with legal and regulatory requirements, resolve disputes, enforce agreements, and protect our legitimate business interests.

The appropriate retention period may vary depending on:

- The nature and sensitivity of the information;
- The purpose for which it was collected;
- Our relationship with you;
- Applicable legal and regulatory requirements;
- Security and fraud prevention requirements; and
- Whether the information is required to establish, exercise, or defend legal claims.

When personal information is no longer required, we will take reasonable steps to securely delete, anonymise, or otherwise dispose of it in accordance with applicable requirements.

9. Cookies and Similar Technologies

TROO may use cookies and similar technologies on its website and Services.

Cookies may be used to:

- Enable essential website functionality;
- Remember preferences;
- Understand how visitors use our website;
- Measure website and product performance;
- Improve user experience; and
- Support marketing and analytics activities.

You may be able to control or disable certain cookies through your browser or device settings.

Disabling certain cookies may affect the functionality of some TROO Services.

10. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes to our products, services, business practices, technology, or legal and regulatory requirements.

When we make material changes, we may notify you by updating the “**Last Updated**” date, publishing the revised Privacy Policy on our website, providing an in-app notification, or using another appropriate communication method where required.

We encourage you to review this Privacy Policy periodically to stay informed about how TROO handles personal information.

Your continued use of the TROO Services following the effective date of an updated Privacy Policy will constitute acknowledgement of the updated Privacy Policy to the extent permitted by applicable law.

11. Contact Us

If you have questions, concerns, complaints, or requests relating to this Privacy Policy or TROO's handling of personal information, please contact us:

TROO

Website:

Email:

Data Protection Contact:

Where required, TROO will take reasonable steps to verify your identity before responding to requests concerning personal information.