

GENIX GENIUS SOFTWARE

PRIVACY POLICIES

GenisoftInc

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This Privacy Policy applies to all websites, software products, and services operated by Genisoft Inc., Certain products may have supplementary privacy notices where their data practices differ significantly from this general policy.

1A. Definitions

The following terms are used throughout this Privacy Policy and carry the meanings set out below:

"Personal Data": Any information relating to an identified or identifiable living individual, including names, contact details, identification numbers, and online identifiers.

"Usage Data": Data collected automatically through the use of our websites or software products, such as IP addresses, browser types, pages visited, session duration, and device identifiers.

"Data Controller": The natural or legal person who determines the purposes and means of processing personal data. For data collected directly through our websites and marketing channels, Genisoft Inc. is the Data Controller.

"Data Processor": Any person or entity that processes personal data on behalf of a Data Controller. For personal data entered by business clients into Genisoft Inc. software products, Genisoft Inc. acts as a Data Processor on behalf of the client.

"Data Subject": Any living individual whose personal data is collected or processed.

"Cookies": Small data files placed on a user's device by a website, used to store session information, preferences, and tracking data.

"Service": Any Genisoft Inc. website, software product, or professional service, including but not limited to genisoftinc.com and all associated product domains.

1. Introduction

Genix Genius Software (trading as Genisoft Inc.), registered in Ghana under BN584200526, is a technology company providing software solutions, web development, mobile applications, and IT services to businesses and institutions across Ghana and beyond.

We are committed to protecting the privacy and personal data of our website visitors, prospective clients, licensed software users, and the end-users whose data may be processed through our software platforms.

This Privacy Policy explains how we collect, use, store, share, and protect personal information across all of our products and services.

2. Scope of This Policy

This policy applies to:

- i.* Visitors to any Genisoft Inc. website, including genisoftinc.com and all product domains
- ii.* Individuals who contact us, request a demo, or subscribe to our newsletter
- iii.* Business clients who license any Genisoft Inc. software product
- iv.* End-users (e.g., customers, students, employees) whose data is processed through our licensed software platforms on behalf of our clients

3. Our Role: Data Controller and Data Processor

3.1 As a Data Controller

Genisoft Inc. acts as a Data Controller for personal data collected directly from website visitors, newsletter subscribers, demo requesters, and prospective clients. In this role, we determine how and why the data is processed.

3.2 As a Data Processor

For licensed software products (such as GenisoftPOS, GenisoftCart, School Management System, and others), Genisoft Inc. acts as a Data Processor on behalf of the business client (the Data Controller). The business client is responsible for the data they collect and enter into the system, and for ensuring their own compliance with applicable data protection laws.

3.2.1 Business clients using any Genisoft

Business clients using any Genisoft Inc. software product are responsible for obtaining appropriate consent from their own customers, students, employees, or other data subjects whose personal information is entered into the system.

4. Information We Collect

4.1 Website and Marketing Data (All Visitors)

- i.* Name and email address submitted via contact or demo request forms
- ii.* Business name, phone number, and service requirements provided voluntarily
- iii.* IP address, browser type, operating system, and pages visited (collected automatically)
- iv.* Newsletter subscription preferences and email engagement data
- v.* Cookie and session data

4.2 Client Account Data (Licensed Software Users)

- i.* Business owner and administrator name, email address, and phone number
- ii.* Business name, registration details, address, and tax identification number
- iii.* Billing and payment records
- iv.* System access logs: login times, user actions, and device information

4.3 End-User Data (Processed on Behalf of Clients)

Depending on the product in use, the following types of end-user data may be stored within the system on behalf of the business client:

- i.* GenisoftPOS / GenisoftCart: customer names, phone numbers, emails, purchase history, credit balances
- ii.* School Management System: student names, enrollment records, academic results, parent contacts
- iii.* Moodle LMS: learner names, course progress, assessment results, login activity
- iv.* GenisoftDESK: support ticket details, user contact information, issue history
- v.* Fleet Systems: driver information, vehicle records, trip logs
- vi.* Other products: relevant operational data as determined by the client's use of the system

4.4 Data We Do NOT Collect

- i.* Full payment card numbers or bank PINs
- ii.* Biometric data
- iii.* Personal data from individuals under the age of 18, except where part of an educational system operated by a licensed institution

5. How We Use Your Information

5.1 Website and Marketing Data

- i.* To respond to inquiries, demo requests, and support tickets
- ii.* To send newsletters, product updates, and relevant offers (with consent)
- iii.* To analyse website performance and improve user experience
- iv.* To process quotations and project agreements
- v.* To comply with legal and regulatory obligations

5.2 Client Account Data

- i. To activate, deploy, and maintain licensed products
- ii. To process payments and manage renewals
- iii. To provide technical support and resolve issues
- iv. To communicate important notices, updates, and renewal reminders

5.3 End-User Data (on Behalf of Clients)

- i. To operate the licensed software system as configured by the business client
- ii. To provide technical support when resolving system issues
- iii. To perform automated backups and ensure data integrity

5.4 Restriction on Commercial Use of Data

We will never use a client's business data or their end-users' data for our own marketing, advertising, or commercial purposes.

6. Legal Basis for Processing

We process personal data in compliance with Ghana's Data Protection Act, 2012 (Act 843). The Company relies on one or more of the following legal bases:

- i. **Consent:** where you have given clear, unambiguous consent to the processing of your personal data for a specific purpose. You may withdraw your consent at any time by written notice to the Company, without affecting the lawfulness of processing carried out prior to withdrawal.
- ii. **Contractual necessity:** where processing is necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract (for example, to process a product order, activate a license, or respond to a service inquiry).
- iii. **Legitimate interests:** where processing is necessary for the purposes of the legitimate interests pursued by the Company, such as operating and improving our products and websites, providing information about our services, and managing pre-sales, post-sales, and client relationship activities, provided such interests are not overridden by your rights and freedoms.
- iv. **Legal obligation:** where processing is necessary to comply with a legal obligation applicable to the Company under Ghanaian law or any other applicable regulation.

7. Sharing Your Information

We do not sell, rent, or trade personal data. We may share data only in the following limited circumstances:

7.1 Third-Party Recipients

Personal data may be shared with the following categories of third-party recipients:

- i.* Technology and infrastructure providers who help us operate our products and websites, including cloud hosting providers, website developers, and IT support teams.
- ii.* Communication and payment service providers who assist in fulfilling transactions or delivering notifications, including SMS gateway providers, email delivery services, and third-party payment processors.
- iii.* Marketing and analytics partners who help us understand website usage and reach prospective clients, using only anonymised or aggregated data where possible.
- iv.* Credit, identity, and fraud prevention agencies, law enforcement bodies, and regulatory authorities, where disclosure is required to comply with our legal obligations, prevent fraud, or investigate a breach of our terms or this policy.

7.2 Data Protection Obligations of Third-Party Recipients

All third-party recipients are required to process personal data only for the specified purpose and are bound by appropriate confidentiality and data protection obligations.

7.2 Legal Requirements

We may disclose data if required by law, court order, or a competent Ghanaian government authority, including the Ghana Revenue Authority or Data Protection Commission.

7.3 Business Transfers

In the event of a merger, acquisition, or sale of business assets, client data may be transferred to the new entity under the same privacy protection. Affected clients will be notified in advance.

8. Cookies and Tracking Technologies

Our websites use cookies to enhance user experience and analyse traffic. Types of cookies used:

Essential Cookies: Required for website functionality, login sessions, and security

Analytics Cookies: Used to understand visitor behaviour and improve our websites

Preference Cookies: Used to remember user settings and display preferences

You may control or disable cookies via your browser settings. Disabling essential cookies may limit website functionality. Our software applications use session cookies to maintain secure user login states.

9. Data Security

We apply appropriate technical and organisational measures to protect all data processed across our products and services:

- i.* HTTPS/SSL encryption for all data in transit across all our websites and applications
- ii.* Encryption for sensitive data stored at rest
- iii.* Role-based access controls to restrict data access to authorised users only
- iv.* Automated cloud backups for hosted and cloud-based products
- v.* System activity and audit logging to detect unauthorised access
- vi.* Regular security reviews and vulnerability assessments of our platforms

9.2 On-Premises Installations

For On-Premises software installations (where the client hosts the software on their own hardware), the client is solely responsible for hardware security, data backups, and network protection.

9A. International Data Transfers

Your personal data may be processed on servers or by service providers located outside of Ghana. Where such transfers occur, the Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Personal data will not be transferred to any organisation or country unless adequate controls are in place to protect the security of your data and to ensure that the recipient is bound by data protection obligations equivalent to those required under Ghana's Data Protection Act, 2012 (Act 843).

By using any Genisoft Inc. product or service and submitting your personal data, you consent to the transfer and processing of your data in accordance with this section.

10. Data Retention

Website and inquiry data: Retained for up to 2 years from last contact

Newsletter subscriber data: Retained until the subscriber unsubscribes

Client account data: Retained for the duration of the active license or service relationship, plus any legally required period

End-user data in software systems: Retained for the duration of the active license; a 14-day export window is provided after license termination, after which data is permanently deleted

System audit logs: Retained for up to 1 year

Anonymised analytics data: May be retained indefinitely in aggregated, non-identifiable form

We will retain personal data for as long as the Client or user maintains an active relationship with the Company, including an active license or service engagement.

After the relationship ends, we will retain personal data only to the extent necessary to comply with our legal obligations, including obligations under any applicable product warranty or support program. Where a contractual relationship has existed, personal data will be retained for a period of six (6) years after the contract ends, unless a longer retention period is required by Ghanaian law or applicable regulation.

After the applicable retention period has elapsed, personal data will be deleted or anonymised in a safe and secure manner.

11. Your Rights

Under Ghana's Data Protection Act (Act 843) and general data protection principles, you have the right to:

Access: Request a copy of the personal data we hold about you

Correction: Request correction of inaccurate or incomplete information

Deletion: Request deletion of your personal data, subject to legal retention obligations

Data Portability: Request export of your data in a usable format

Objection: Object to processing for direct marketing or beyond what is necessary for service delivery

Withdrawal of Consent: Withdraw your consent at any time where processing is consent-based

Marketing Communications: If you wish to stop receiving marketing emails or promotional communications from the Company, you may unsubscribe at any time by contacting us directly using the details in Section 15 of this policy, or by clicking the "Unsubscribe" link included in any marketing email we send. Withdrawal of marketing consent does not affect the delivery of transactional or service communications necessary for your active license or engagement.

Complaints: You have the right to lodge a complaint regarding the manner in which the Company processes your personal data with the Ghana Data Protection Commission (DPC). We encourage you to contact us first so that we may attempt to resolve your concern directly before escalating to the Commission.

To exercise any of these rights, contact us using the details in Section 15.

12. End-User Data Rights

Individuals whose personal data has been entered into a Genisoft Inc. software platform by a business client (e.g., a customer of a retail store, a student at a school) should direct their data access or deletion requests to that business directly, as the business is the Data Controller for that data. Genisoft Inc. will cooperate with legitimate requests forwarded by our clients.

13. Third-Party Links and Integrations

Our websites and software products may include links to or integrations with third-party services (e.g., payment gateways, SMS providers, social media platforms). These third parties operate under their own privacy policies.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services. When you leave any Genisoft Inc. website or are directed to a third-party integration, we strongly encourage you to read the privacy notice of every website or service you visit or connect to.

14. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our product offerings, practices, or applicable laws. When material changes are made, we will notify you prior to the change becoming effective by:

- i.* posting the updated policy on our website and updating the "Last Updated" date at the top of the document; and
- ii.* where practicable, sending a notification via email to active clients or displaying a prominent notice within the relevant product or platform.
- iii.* You are encouraged to review this Privacy Policy periodically. Continued use of any Genisoft Inc. product or service after the effective date of an update constitutes acceptance of the revised policy.

15. Contact Us

For privacy-related questions, data requests, or concerns:

Company: Genix Genius Software (*trading as Genisoft Inc.*)

Registration No.: BN584200526 | TIN: P006695679X

Website: <https://genisoftinc.com>

Phone / WhatsApp: +233 247 577 332

Email: dansoetorclement@gmail.com | info@genisoftinc.com

Address: Akosombo High Street, Asuogyaman District, Eastern Region, Ghana

We will respond to all privacy-related requests within 30 days.