

STRULLO PRIVACY NOTICE

This Privacy Notice explains how Strullo (“Strullo,” “we,” “us,” or the “Company”) collects, uses, shares, and protects personal data when you use the Strullo website, mobile application, and associated services (the “Platform”), whether as a student or a tutor. This Notice is incorporated by reference into the Strullo Terms of Service and, for tutors, the Strullo Tutor Agreement.

Strullo processes personal data as a data controller in accordance with the Nigeria Data Protection Act 2023 (“NDPA”) and applicable regulations issued by the Nigeria Data Protection Commission (“NDPC”). This Notice describes our data protection practices under the Nigeria Data Protection Act 2023 (“NDPA”) and applicable NDPC regulations. It does not address the data protection laws of any other country. If you are located outside Nigeria, other laws may apply to you or to our processing of your personal data. This Notice does not describe those laws or state whether we comply with them, and you should not rely on it for information about your rights, or our obligations, under any law other than the NDPA.

1. WHO WE ARE

Strullo is the data controller responsible for your personal data under this Notice. Our contact details, and the contact details of our data protection point of contact, are set out in Section 14 (Contact Us).

2. SCOPE OF THIS NOTICE

This Notice applies to personal data we collect through the Platform, including during account registration, tutor onboarding, booking and delivery of tutoring sessions, payment processing, and customer support. It does not apply to third-party websites or services that may be linked from the Platform, including our payment processor’s own platform, which maintains its own privacy notice.

3. INFORMATION WE COLLECT

3.1 Account Information.

When you create an Account, we collect information such as your name, email address, phone number, and password.

3.2 Tutor Onboarding Information.

If you apply to become a tutor, we collect additional information necessary for manual review and approval, including identity documents, and, where applicable, certifications and qualifications. This information is used to assess your suitability to be listed as a tutor and is handled in accordance with Section 5 (How We Share Your Information).

3.3 Booking and Session Information.

We collect information related to your use of the Platform to book, schedule, conduct, reschedule, or cancel tutoring sessions, including session times, exam category, session pricing, and messages exchanged through the Platform.

3.4 Payment Information.

Payments on the Platform are processed by Startbutton, our escrow-based payment processor. We do not directly store your full payment card or bank account details; Startbutton collects and processes this information subject to its own privacy notice. We receive limited information from Startbutton necessary to reconcile bookings, commission, and payouts.

3.5 Usage and Device Information.

We automatically collect certain technical information when you use the Platform, including your IP address, device and browser type, operating system, and how you interact with the Platform, including through cookies and similar technologies described in Section 11.

3.6 Information from Others.

We may receive information about you from another user of the Platform, for example where a student or tutor submits a report about you under the conduct or misconduct-reporting provisions of the Terms of Service or the Tutor Agreement.

4. HOW WE USE YOUR INFORMATION

We use personal data for the following purposes, on the legal bases indicated:

- To create and administer your Account, and to operate the booking, scheduling, and payment features of the Platform (necessary for the performance of our contract with you).
- To review and approve tutor applications, including verifying identity and qualifications (necessary for the performance of our contract with you, and our legitimate interest in maintaining a vetted marketplace).
- To process payments and payouts through Startbutton, and to comply with applicable tax and financial regulations (necessary for the performance of our contract with you, and to comply with a legal obligation).
- To investigate reports of misconduct, off-platform solicitation, or violations of the Terms of Service or Tutor Agreement (necessary for our legitimate interest in maintaining the safety and integrity of the Platform).
- To communicate with you about bookings, Platform updates, and customer support (necessary for the performance of our contract with you).

- To send you marketing communications about the Platform, where you have consented to receive them (based on your consent, which you may withdraw at any time).
- To detect, prevent, and address fraud, security incidents, and technical issues (necessary for our legitimate interest in protecting the Platform and its users).
- To comply with applicable law, regulation, or a valid legal process (necessary to comply with a legal obligation).

5. HOW WE SHARE YOUR INFORMATION

5.1 With Other Users.

If you are a tutor, certain information about you, such as your name, photograph, biography, and reviews, is visible to students on the Platform in order for students to make a booking decision. If you are a student, your name and booking details are shared with the tutor you book, solely for the purpose of delivering the session.

5.2 With Startbutton.

We share information necessary for Startbutton to process payments, hold funds in escrow, and remit payouts and applicable taxes, as described in Section 3.4.

5.3 With Service Providers.

We share information with third-party service providers who perform services on our behalf, such as cloud hosting, analytics, and customer support tools, under contractual obligations to protect your information and use it only for the purposes we specify.

5.4 For Legal Reasons.

We may disclose information where required by law, regulation, court order, or valid request by a public authority, or where necessary to protect the rights, property, or safety of Strullo, our users, or the public.

5.5 Business Transfers.

If Strullo is involved in a merger, acquisition, or sale of all or substantially all of its assets, personal data may be transferred as part of that transaction, subject to this Notice or a successor notice.

5.6 No Sale of Personal Data.

We do not sell your personal data to third parties.

6. DATA RETENTION

We retain personal data for as long as necessary to provide the Platform, comply with our legal obligations (including tax and financial recordkeeping obligations arising from payments processed through Startbutton), resolve disputes, and enforce our agreements. When personal data is no longer needed for these purposes, we delete or anonymize it.

7. YOUR RIGHTS

Subject to applicable law, you have the following rights in relation to your personal data:

- to request a copy of the personal data we hold about you.
- to request that we correct inaccurate or incomplete personal data.
- to request that we delete your personal data, subject to our legal and contractual retention obligations.
- to request that we restrict our processing of your personal data in certain circumstances.
- to object to our processing of your personal data where we rely on legitimate interest as the legal basis.
- to request a copy of certain personal data in a structured, commonly used, machine-readable format.
- to withdraw consent at any time where our processing is based on your consent, without affecting the lawfulness of processing carried out before withdrawal.

To exercise any of these rights, contact us using the details in Section 14 (Contact Us). We will respond to your request within the timeframe required by the NDPA. You also have the right to lodge a complaint with the Nigeria Data Protection Commission if you believe our processing of your personal data violates applicable law.

8. CHILDREN'S PRIVACY

The Platform is not directed to, and Accounts may not be created by, individuals under eighteen (18) years of age, consistent with the minimum age requirement in the Terms of Service. We do not knowingly collect personal data from individuals under 18. If we become aware that we have collected personal data from someone under 18, we will take steps to delete that information.

9. INTERNATIONAL DATA TRANSFERS

We may store or process personal data on servers located outside Nigeria, including where our hosting or service providers operate internationally.

10. SECURITY

We use reasonable technical and organizational measures designed to protect personal data against unauthorized access, loss, misuse, or alteration. No method of transmission or storage is completely secure, and we cannot guarantee absolute security. If we become aware of a data breach affecting your personal data, we will notify you and the NDPC as required by applicable law.

11. COOKIES AND TRACKING TECHNOLOGIES

We use cookies and similar technologies to operate the Platform, remember your preferences, and understand how the Platform is used. You can control cookies through your browser settings, though disabling certain cookies may affect the functionality of the Platform.

12. THIRD-PARTY LINKS

The Platform may contain links to third-party websites or services, including Startbutton. This Notice does not apply to those third parties, and we encourage you to review their privacy notices separately.

13. CHANGES TO THIS NOTICE

We may update this Notice from time to time. Where we make a material change, we will provide notice through the Platform or by email before the change takes effect. Unless stated otherwise, modifications will become effective on the day they are posted.

As permitted by applicable law, if you continue to use the Services after the effective date of any change, then your access and/or use will be deemed an acceptance of (and agreement to follow and be bound by) the revised Privacy Policy. The revised Privacy Policy supersedes all previous Privacy Policies.

The “Last updated” date at the bottom of this Notice indicates when it was last revised.

14. CONTACT US

If you have questions about this Notice or wish to exercise your rights under Section 7, contact us at: strullo@gmail.com.

By using the Platform, you acknowledge that you have read and understood this Privacy Notice.

Last updated: 20th July 2026