

RAILS CLOUD

Privacy Policy

How we collect, use, protect, and respect your personal information

Version
1.0

Effective Date
1 March 2026

Last Reviewed
1 March 2026

Jurisdiction
Republic of Zimbabwe

1. About This Policy

This Privacy Policy ("Policy") describes how Rails Net (Private) Limited, trading as Rails Zimbabwe and operating the Rails Cloud platform ("Rails Cloud", "we", "us", "our"), collects, uses, stores, discloses, and protects personal information in connection with our cloud infrastructure services, products, and website.

This Policy applies to:

- Visitors to the Rails Cloud website at railscloud.co and its subdomains
- Individuals who register for and use Rails Cloud services ("Users")
- Authorised users added to a Customer account by an account holder
- Individuals who contact Rails Cloud for support, sales, or other enquiries

This Policy does not apply to Customer Data — the data that Customers process, store, or transmit using Rails Cloud's infrastructure. Customer Data is governed by the Rails Cloud Data Processing Agreement (DPA). Rails Cloud processes Customer Data as a data processor acting on behalf of the Customer as data controller.

NOTE

If you are a Customer using Rails Cloud to process the personal data of your own users or clients, please refer to the Rails Cloud Data Processing Agreement (DPA) available at railscloud.co/legal/dpa for the specific obligations governing that processing.

2. Data Controller Identity

Legal Entity	Rails Net (Private) Limited
Trading Name	Rails Zimbabwe / Rails Cloud
Registration Number	84172A0722026
TIN	2002425765
Incorporated	19 February 2026, Republic of Zimbabwe
Principal Place of Business	Zimbabwe

Privacy Contact	privacy@railscloud.co
Website	www.railscloud.co

3. Personal Information We Collect

3.1 Information You Provide Directly

We collect personal information that you voluntarily provide when you:

Activity	Information Collected	Purpose
Create an account	Full name, email address, password (hashed), company name	Account creation and authentication
Subscribe to a paid plan	Billing name, billing address, payment method details (processed by payment provider)	Billing and invoicing
Contact support	Name, email, content of your message, support ticket history	Providing support and resolving issues
Complete KYC verification (Rails Pay)	National ID, proof of address, business registration documents	Regulatory compliance and fraud prevention
Sign up for communications	Email address, communication preferences	Product updates and marketing (with consent)
Complete an enterprise enquiry	Name, company, role, phone number, requirements	Sales engagement and account setup

3.2 Information We Collect Automatically

When you use our website or services, we automatically collect certain technical information:

- IP address and approximate geographic location derived from IP
- Browser type, version, and operating system
- Pages visited, time spent on pages, referring URLs, and navigation patterns
- Device identifiers and screen resolution
- API access logs including endpoint, timestamp, response codes, and request volume
- Error logs and crash reports from the Rails Cloud dashboard
- Session identifiers and authentication tokens (stored securely, not linked to browsing activity)

3.3 Information From Third Parties

We may receive personal information from third parties in the following circumstances:

- Payment processors (confirming transaction status, not full card details)
- Identity verification services (confirming KYC outcomes for Rails Pay)

- AWS and our infrastructure providers (aggregated usage metrics, no personal data beyond IP logs)
- Business partners and referral sources (contact details where you have consented to sharing)

4. How We Use Your Personal Information

4.1 Legal Bases for Processing

Rails Cloud processes personal information on the following legal bases under the Zimbabwe Cyber and Data Protection Act (Chapter 11:23) and applicable data protection principles:

Legal Basis	When We Use It	Examples
Contract performance	Processing necessary to deliver the contracted services	Account management, billing, service delivery
Legitimate interests	Where our interests do not override your rights	Security monitoring, fraud prevention, product improvement
Legal obligation	Compliance with applicable law	KYC/AML obligations, tax records, regulatory reporting
Consent	Where you have freely given, specific consent	Marketing emails, optional analytics cookies

4.2 Specific Purposes

We use your personal information for the following specific purposes:

- Providing, maintaining, and improving Rails Cloud services
- Creating and managing your account and authenticating access
- Processing payments and managing billing and invoicing
- Communicating with you about your account, service status, and support requests
- Sending product updates, security alerts, and maintenance notifications (service communications — these cannot be opted out of while you hold an active account)
- Sending marketing communications, newsletters, and product announcements (only with your consent, which you may withdraw at any time)
- Detecting and preventing fraud, abuse, and security incidents
- Complying with legal and regulatory obligations including KYC/AML requirements applicable to Rails Pay
- Conducting internal analytics to understand usage patterns and improve the platform
- Enforcing our Terms of Service and other agreements

5. How We Share Your Personal Information

5.1 We Do Not Sell Your Data

Rails Cloud does not sell, rent, or trade personal information to third parties for their own commercial purposes. This is an absolute commitment, not subject to exceptions.

5.2 Authorised Sharing

We share personal information only in the following circumstances:

Recipient	Purpose	Safeguards
AWS (infrastructure)	Hosting, compute, and storage services	AWS DPA in place; data minimisation applied
Payment processors	Processing subscription and transaction payments	PCI-DSS compliant; contractual data protections
KYC/identity providers	Regulatory identity verification for Rails Pay	Contractual obligations; data minimisation
Customer support tools	Managing support tickets and communications	Data processing agreements in place
Regulatory authorities	Compliance with lawful government or regulatory requests	Only where legally required; minimum disclosure
Professional advisors	Legal, accounting, and audit services	Bound by professional confidentiality obligations
Business successors	In the event of merger, acquisition, or asset sale	Notice provided; same privacy protections apply

5.3 Subprocessor List

A current list of all third-party subprocessors used by Rails Cloud, including their location and the nature of processing, is maintained and published at railscloud.co/legal/subprocessors. We will provide 30 days advance notice of any new subprocessors who will process personal data.

6. Data Storage, Retention, and Cross-Border Transfers

6.1 Primary Data Location

Customer account data and personal information relating to Rails Cloud Users is primarily stored on infrastructure located within the African continent. Rails Cloud uses AWS infrastructure and where possible prioritises African regions (Cape Town: af-south-1) to ensure data residency within Africa.

6.2 Cross-Border Transfers

Where personal information is transferred outside Zimbabwe or the African Union, Rails Cloud ensures that appropriate safeguards are in place, including:

- Standard contractual clauses with receiving entities
- Data processing agreements requiring equivalent data protection standards
- Transfer impact assessments where required by applicable law

You may request details of the specific safeguards applicable to your data by contacting privacy@railscloud.co.

6.3 Retention Periods

Data Category	Retention Period	Basis
Account information	Duration of account + 12 months	Contract performance
Billing and invoice records	7 years post-transaction	Legal obligation (tax law)
Support communications	3 years from last interaction	Legitimate interests
KYC documents (Rails Pay)	7 years post account closure	Legal obligation (AML law)
Access and security logs	12 months	Security and fraud prevention
Marketing consent records	Until withdrawal + 3 years	Legal obligation (evidence of consent)
Website analytics	26 months (aggregated)	Legitimate interests

7. How We Protect Your Personal Information

Rails Cloud implements technical and organisational measures to protect personal information against unauthorised access, accidental loss, destruction, or disclosure. These measures include:

Control Category	Measures Implemented
Encryption	TLS 1.2+ for all data in transit; AES-256 encryption for data at rest in all storage systems
Access Control	Role-based access control (RBAC); principle of least privilege; MFA required for all internal administrative access
Authentication	Hashed passwords using bcrypt with per-user salts; API key rotation policies; session timeout controls
Monitoring	24/7 automated security monitoring; anomaly detection; intrusion detection systems on all production infrastructure
Vulnerability Management	Regular dependency scanning; responsible disclosure programme; periodic penetration testing
Incident Response	Documented incident response plan; defined escalation paths; post-incident review process
Personnel	Confidentiality obligations for all staff and contractors with access to personal data; privacy training

7.1 Personal Data Breach Notification

In the event of a personal data breach that is likely to result in a risk to your rights and freedoms, Rails Cloud will:

1. Notify the relevant supervisory authority (Zimbabwe Data Protection Authority) within 72 hours of becoming aware of the breach, where feasible
2. Notify affected individuals without undue delay where the breach is likely to result in a high risk to their rights
3. Provide notification containing: the nature of the breach, categories of data affected, likely consequences, and measures taken or proposed

8. Your Data Protection Rights

Under the Zimbabwe Cyber and Data Protection Act and applicable data protection principles, you have the following rights in relation to your personal information:

Right	What It Means	How to Exercise
Right of access	Request a copy of the personal information we hold about you	privacy@railscloud.co
Right to rectification	Request correction of inaccurate or incomplete personal information	Dashboard or privacy@railscloud.co
Right to erasure	Request deletion of your personal information where we no longer have a legitimate basis to retain it	privacy@railscloud.co
Right to restriction	Request that we restrict processing of your data in certain circumstances	privacy@railscloud.co
Right to portability	Receive your personal information in a structured, machine-readable format	privacy@railscloud.co
Right to object	Object to processing based on legitimate interests, including direct marketing	Unsubscribe link or privacy@railscloud.co
Right to withdraw consent	Withdraw consent at any time where processing is based on consent, without affecting prior processing	Dashboard preferences or privacy@railscloud.co

We will respond to all rights requests within 30 calendar days. Where a request is complex or numerous, we may extend this period by a further 60 days with written notice. We will not charge a fee for processing rights requests unless they are manifestly unfounded or excessive.

9. Cookies and Tracking Technologies

Our website uses cookies and similar tracking technologies. A full description of the cookies we use, their purpose, and how to manage your preferences is set out in our Cookie Policy, available at railscloud.co/legal/cookies.

In summary, we use:

- Strictly necessary cookies — required for the website and dashboard to function. These cannot be disabled.
- Analytics cookies — help us understand how the website is used. These are optional and require your consent.
- Preference cookies — remember your settings and preferences. These are optional.
- We do not use advertising or third-party tracking cookies.

10. Children's Privacy

Rails Cloud services are not directed at individuals under the age of 18. We do not knowingly collect personal information from minors. If you believe we have inadvertently collected personal information from a person under 18, please contact privacy@railscloud.co and we will delete the information promptly.

11. Third-Party Links

Our website and platform may contain links to third-party websites and services. This Policy does not apply to those third-party sites. We encourage you to review the privacy policies of any third-party sites you visit. Rails Cloud is not responsible for the privacy practices of third parties.

12. Changes to This Policy

We may update this Privacy Policy from time to time. Material changes — those that significantly affect how we use your personal information or reduce your rights — will be communicated by email to registered account holders at least 30 days before they take effect. Non-material updates will be posted on our website with the revised effective date.

Continued use of Rails Cloud services after the effective date of a revised Policy constitutes acceptance of the updated terms. Previous versions of this Policy are archived at railscloud.co/legal/archive.

13. Governing Law and Supervisory Authority

This Policy is governed by the laws of the Republic of Zimbabwe, including the Cyber and Data Protection Act (Chapter 11:23). Any disputes arising in connection with this Policy shall be subject to the jurisdiction of the courts of Zimbabwe.

If you have concerns about how we handle your personal information that we have not resolved to your satisfaction, you have the right to lodge a complaint with the relevant data protection supervisory authority in Zimbabwe or your country of residence.

14. Contact Us

For all privacy-related enquiries, requests, or concerns, please contact:

Privacy Officer

privacy@railscloud.co

Response within 2 business days

Registered Office

Rails Net (Private) Limited

Registration No. 84172A0722026

TIN: 2002425765 | Zimbabwe

This Privacy Policy should be read alongside the Rails Cloud Terms of Service, Data Processing Agreement, Cookie Policy, and Service Level Agreement. All legal documents are available at railscloud.co/legal. Rails Cloud is committed to being the most privacy-respecting cloud provider on the African continent.