

PRIVACY POLICY

Document effective: *June 01, 2021*

1. INTRODUCTION

Hi!

Credit Wallet (“we”, “us” or “our”) have created this Privacy Policy to explain how we collect, use, disclose and protect your Personal Data, including any other information you provide us with.

You accept this Privacy Policy and hereby give us consent to save, process and use your Personal Data to the extent as allowed by the Nigeria Data Protection Regulation (NDPR) and other relevant law when you provide us with details of your Personal Data or by clicking on the “accept” button.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy, and in some cases, we may provide you with additional notice (such as by adding a statement to the homepages of our website or [*mobile application*] or by sending you an email notification).

We encourage you to review our Privacy Policy whenever you interact with us to stay informed about our Personal Data practices and the ways you can help protect your privacy.

2. COLLECTION OF INFORMATION

We may collect and process the following information about you:

- Information that you provide to us, for example when you fill out our web form.
- When you send us a mail, email, or register to receive alerts or updates.
- When you provide your Personal Data while signing up for our loan service.
- Personal Data that we obtain or learn, such as information about the browser or device you use to access this site, how you use this site and the pages you visit, traffic and location data.
- When you contact our customer support whether by phone, email, or chat.
- We may receive information about you if you use any of the other websites we operate, the other services we provide and/or the social media sites which you login to via our site. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, social media sites, advertising networks, analytics providers, search information providers, credit bureaus, and financial services and credit providers) and may receive information about you from them.

- [We may also ask you for information if you experience problems when using this site. We may also ask you to complete surveys for research purposes, although you do not have to respond to these].

3. USE OF PERSONAL DATA

We may use your Personal Data, including non-public Personal Data as follows:

- i. Provide, maintain, and improve our services.
- ii. Provide and deliver the products and services you request, process transactions and send you related information, including confirmations.
- iii. Verify your identity and prevent fraud.
- iv. Send you technical notices, updates, security alerts and support and administrative messages.
- v. Respond to your comments, questions and requests and provide customer service.
- vi. Communicate with you about products, services, offers, promotions, rewards, and events offered by us and others, and provide news and information we think will be of interest to you.
- vii. Monitor and analyse trends, usage and activities in connection with our services.
- viii. Personalize and improve the services and provide advertisements, content or features that match user profiles or interests.
- ix. [*Process and deliver contest or promotion entries and rewards*].
- x. Link or combine with information we get from others to help understand your needs and provide you with better service.
- xi. Carry out any other purpose for which the Personal Data was collected.

Credit Wallet is a product of Princeps Credit Systems Limited, a company based in Nigeria and the information we collect is governed by the Nigeria Data Protection Regulation (NDPR). By accessing or using the Services or otherwise providing information to us, you consent to the processing and transfer of information in and to Nigeria [*and other countries*].

4. USE OF COOKIES

Cookies allow a web server to transfer data to a computer or device for recordkeeping and other purposes. We use cookies and other technologies to, among other things, better serve you with more tailored information and facilitate your ongoing access to and use of our website. If you do not want information collected using cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. To learn more about cookies, please visit <http://www.allaboutcookies.org/>

We may use various cookies on our website, such as:

Necessary Cookies

These cookies are essential to enable you to browse around our website and use its features.

Non-Necessary Cookies

These cookies allow our website to remember choices you make while browsing. For instance, we may store your geographic location in a cookie to ensure that we show you our localized website (when applicable). These cookies may also be used to keep track of what featured products have been viewed to avoid repetition. The information these cookies collect will not personally identify you, and they cannot track your browsing activity on non-Credit Wallet's websites.

We treat information collected by cookies and other technologies as non-personal data. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered Personal Data by local law, we also treat these identifiers as Personal Data. Similarly, to the extent that non-personal data is combined with Personal Data, we treat the combined information as Personal Data for the purposes of this Privacy Policy.

5. LEGAL BASIS FOR PROCESSING PERSONAL DATA

We consider that the legal basis for using your personal information as set out in this privacy policy are as follows:

- i. To perform a contract with you or to take steps at your request before entering a contract.
- ii. To comply with our legal and regulatory obligations.
- iii. To respect your choice if we request your consent for specific processing.
- iv. To use your personal information as is necessary for our legitimate interests or the legitimate interests of others. In some cases, we have identified where this is the case elsewhere in this privacy policy.

6. DISCLOSURE OF PERSONAL DATA

We only disclose Personal Data with other companies or individuals in the following limited circumstances:

- We may provide such Personal Data to affiliated companies or other trusted businesses or persons for the purpose of processing Personal Data on our behalf. We require that these parties agree to process such Personal Data based on our instructions and in compliance with the Nigeria Data Protection Regulation (NDPR) and any other appropriate confidentiality and security measures. When they no longer need your Personal Data to fulfil this service, they will dispose of the details in line with the NDPR.

- *[With other third-parties such as email service providers that perform marketing services on our behalf].*
- With other non-affiliated companies for our everyday business purposes, such as to process transactions, maintain accounts, respond to court orders and legal investigations.
- In response to a request for Personal Data, if we are required by, or we believe disclosure is in accordance with, any applicable law, regulation or legal process.
- With relevant law enforcement officials or other third parties, such as investigators or auditors, if we believe it is appropriate.
- In connection with, or during negotiations of, any merger, sale of our assets, financing or acquisition of all or a portion of our business to another company; and
- With your consent or at your direction, including if we notify you that the Personal Data you provide will be shared in a particular manner and you provide such Personal Data.
- We may also share aggregated or de-identified or anonymized information, which cannot reasonably be used to identify you.

When Credit Wallet does not have a lawful basis for disclosure of your Personal Data, we will obtain consent from you before sharing your Personal Data with third parties. Where we need to transfer your Personal Data to another country, such country must have an adequate data protection law. We will seek your consent where we need to send your Personal Data to a country without an adequate data protection law.

7. SECURITY

We take reasonable measures to help protect all Personal Data about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Additionally, Credit Wallet implements policies designed to protect the confidentiality and security of your Personal Data. *[We have also taken measures to comply with provision of security facilities for the protection of your Personal Data through the set-up of firewalls, limited access to specified authorized individuals, encryption and continuous capacity building for relevant personnel. We therefore have digital and physical security measures to limit and eliminate possibilities of data privacy breach incidents].*

8. HOW LONG WE KEEP YOUR PERSONAL DATA

We will hold your Personal Data on our systems for as long as it is necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

9. YOUR RIGHTS AS A DATA SUBJECT

You have certain rights in respect to your Personal Data we hold about you. Below is a highlight of some of those rights. At any point while we are in possession of or processing your Personal Data, you, the Data Subject has the following rights:

- RIGHT OF ACCESS – You have the right to request a copy of the information that we hold about you.
- RIGHT TO RECTIFY – You have the right to correct the Personal Data we hold about you that is inaccurate.
- RIGHT TO BE FORGOTTEN – In certain circumstances you may ask for the data we hold about you to be erased from our record.
- RIGHT TO RESTRICT PROCESSING – Where certain conditions apply; you have a right to restrict processing of your Personal Data.
- RIGHT TO PORTABILITY – You have the right to have your Personal Data transferred to another organisation.
- LODGE COMPLAINT – You have a right to lodge a complaint about the handling of your Personal Data with the National Information Technology Development Agency (NITDA) at info@nitda.gov.ng
- RIGHT TO OBJECT – You have the right to object to the Processing of Personal Data.

NITDA's website (<https://nitda.gov.ng/>) has a wealth of useful information in respect of your rights over your Personal Data. If you wish to exercise your rights, you may contact our Data Protection Officer at <mailto:s.ali@taxaide.com.ng>

10. BREACH/ PRIVACY VIOLATION

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data, we shall within 72 (Seventy-Two) hours of having knowledge of such breach report the details of the breach to NITDA.

Furthermore, where we ascertain that such breach is detrimental to your rights and freedoms in relation to your Personal Data, we shall take reasonable steps to inform you of the breach incident, the risk to your rights and freedoms resulting from such breach and any course of action to remedy said breach.

11. QUESTIONS OR CONCERNS

If you have any questions or concerns about this Privacy Policy or would like to contact us for any reason, you can contact us at <mailto:support@creditwallet.ng>