



PRIVACY POLICY

Personal Information at IVANTAGE

Background

We are iVantage Technology Limited ('we', 'our', 'us') and operate under the name iVantage. We are registered with the Corporate Affairs Commission with the number RC1872052.

This policy describes what Information we collect about you, how we collect and use the information, with whom we share the information and your rights relating to the personal data when you use "our" services in line with the Nigerian Data Protection Regulation 2019 (NDPR).

This policy should be brought to the attention of any party using the App developed by "us" that by providing their personal information or the personal information of someone included in your account information, they acknowledge that we may use that information only in the ways set out in this policy.

We are devoted to guarding your Personal Information while you use "our" services. By continuing to use "our" services, you acknowledge that you have reviewed the Privacy Policy and agree to its terms. This also means that you have agreed to the use of your Personal Data and have recognized the applicable disclosures.

What information do we collect?

We collect several information to enable us deliver quality service to all our users. Contingent on how our service will be used, the various types of Personal Information we collect are as follows:

All users:

We collect passive information from all users. This information includes cookies, IP address information, location information and certain browser information.

Information "we" collect when you sign up to use our service:

1. We use **log files** which store automatic information collected when users sign up for "our" service. The information which may be collected are as follows:
 - the domain and host from which you access the **Website**;
 - name of the Internet Service Provider (ISP);
 - date and time of visit
 - your computer operating system and browser software



- web pages visited, the duration, and frequency of visits
- your Internet Protocol (IP) address.

Furthermore, we may request explicit permission to see other information like your address book, location, photos and data from your camera.

2. Sales and billing data: We may collect your credit and/or debit card information, which includes your card number, password, etc., Your billing address, your contact address and other information requisite for your transactions.

3. App support services: In providing support services for users of “our” iVantage App, we have access to information supplied by customers who make use of the app like:

- BVN, name, date of birth, gender, phone number, residential address, and email address.
- passport photograph, utility bill, ID and signature also collected for KYC purposes

Information you give us when you contact us:

When you contact “us” through any means other than the in-app chat, we gather the following data so we can respond to your questions or take action:

- The phone number you’re calling from and information you give us during the call.
- The email address you use and the contents of your mail (and any attachments).
- Public details from your social media profile (like Facebook, Instagram or Twitter) if you reach out to us via these platforms, and the contents of your messages or posts to us.

How do we use your personal information?

The Nigerian Data Protection Regulation says we need to have a lawful basis for using your personal information. At least one of the following must apply: contractual or legal duty, legitimate interest, public interest, vital individual interest or consent,

Contractual/ Legal Duty

- Processing is essential in order to deliver services agreed to in line with our terms and conditions.
- Examine and resolve complaints and other issues.
- Send data about your account and other services you use if you reach out to us, or we need to share vital information with you.

- Where we need to use your personal data to form, exercise or defend our legal rights, for example when we are faced with any legal claims or where we want to pursue any legal claims ourselves. This can be based on either our legitimate interest to defend ourselves or terms of our contract with you.

Legitimate Interest

- Where we need to communicate with you to resolve grievances or other issues based on our contractual obligations with you.
- Where we have appropriate legitimate business, we need to use your personal information such as keeping our business records, developing and improving our products and services, sharing data with contracted third parties all whilst guaranteeing that such business need does not hamper your rights and freedoms and does not cause you any impairment.

Consent

- Where you have provided your consent to our use of your personal data. We will typically only ask for your consent in relation to processing your sensitive personal data or when providing marketing information to you (including data about other products and services). This will be made clear when you offer your personal data. If we ask for your consent, we will explain why it is needed.
- We'll ask for your consent to market and communicate our products and services. You can always unsubscribe from receiving these if you so wish.

Public Interest

- Where we need to use your personal data for reasons of extensive public interest, such as investigating fraudulent claims and carrying out fraud, credit and anti-money laundering checks, identification checks. We process this sort of data based on legitimate interest to protect ourselves from fraud as well as a legal obligation to implement anti-money laundering safeguards.
- Nigeria Information Technology Development Agency (NITDA) may require us to retain records of our transactions with you, this will be based on legal obligation.
- To comply with: local or foreign laws, regulations, voluntary codes, directives, judgments or court orders, regulator, or enforcement agency; policies (including the iVantage policies), good practice, government sanctions or embargoes, reporting requirements under financial transactions legislation and demands or requests of any authority, regulator, tribunal, enforcement agencies [i.e. the Nigeria Financial Intelligent Unit ("NFIU") and the Economic and Financial Crime Commission ("EFCC")], or exchange body, this processing activity will be based on a legal obligation.

Who do we share your information with?

We might share your data with third parties that we do business with. We will not share any of your personal data other than for the purposes described in this policy. When we share your data with third parties, it is kept strictly private and will be used for reasons that we've described.

Third parties we share your information with are listed below:

- Your relatives or, guardians (on your behalf where you are incapacitated or unable) or other people or organizations associated with you or your lawyer.
- Where you have named an alternative contact (such as a relative) to speak with us on your behalf. Once you have told us your alternative contact, this person will be able to discuss all aspects of your policy (including claims and cancellation) with us and make changes on your behalf.
- Financial Institutions who are our clients for the provision of both banked and unbanked service provision.
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers.
- The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime.
- Central Bank of Nigeria and other regulators.
- Our third-party services providers such as IT suppliers, auditors, lawyers, marketing agencies, research specialists, document management providers and tax advisers.
- Customer satisfaction survey providers.
- Credit bureau.
- Disclosure of your personal information to a third party will only be made where the third party has agreed to keep your information strictly confidential and shall only be used for the specific purpose for which we provide it to them.

We may also disclose your personal information to other third parties where:

- We are required or permitted to do so by law or by regulatory bodies such as where there is a court order, statutory obligation.
- We believe that such disclosure is necessary in order to assist in the prevention or detection of any criminal action (including fraud) or is otherwise in the overriding public interest; or exemptions under the data protection legislation allow us to do so.

Transfers outside of Nigeria

Where we need to transfer your data to another country, such country must have an adequate data protection law.



Where we need to send your data to a country without an adequate data protection law, iVantage will ensure Appropriate Safeguards have been implemented to ensure that your personal information is protected. Such steps may include placing the party we are transferring personal information to under contractual obligations to protect it to adequate standards.

Occasionally there may also be some circumstances where we are required to transfer your personal information outside of Nigeria and we shall rely on the basis of processing it for being necessary for the performance of your contract.

How long do we keep your data?

We keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this policy and in order to comply with our legal and regulatory obligations.

The length of time we retain personal information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend our legal rights.

These retention requirements supersede any right to erasure requests under applicable data protection laws. We cannot therefore erase your data until after this time period, however we can assure you that your data will be held safely and securely whilst under our supervision

Where do we store your data?

The Personal Data that we collect from you will be transferred to and stored at destinations within Nigeria. By submitting your Personal Data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Policy.

Storage of Personal Data

The Personal Data and any other information we have about you may be stored for such period as we may determine until you withdraw your consent. We will also delete your data when you cease to be our customer, subject to our contractual and legal obligations.

We take the security of the Personal Data we collect very seriously, and we take reasonable measures to reduce the risk of accidental destruction, loss or unauthorized access to such information. However, please note that no system involving the transmission of information via electronic storage systems or the internet is completely secure

What are your rights?

- You have a right to consent to this Policy and to withdraw your consent at any time



- You have the right to access and request the information that we have of you in our records, ask that we update the personal information we hold about you or correct such personal information which you think is incorrect or incomplete, and we will grant this request as long as we're legally allowed to
- You may also ask us to delete our record of you, restrict the way in which we use your personal information.
- You also have the right to object to us using your information for our marketing purposes or any additional services we may be offering you.
- You have the right to be informed about any rectification or erasure of Personal Data or restriction of any processing carried out.
- You also have the right to block Personal Data processing in violation of any law
- You have the right to lodge a complaint to a supervisory authority within Nigeria

Contact Information

At iVantage we are extremely committed to respecting and protecting your information.

If you have any questions regarding this Privacy Policy or the Personal Data we collect, or if You wish to exercise any of the data subject rights listed above, make any comments or complaints about anything related to this Privacy Policy, please contact our Data Protection Officer by:

- Sending a message via the app
- Emailing us at info@ivantage.africa
- Writing to us at 124, Norman Williams Street, Ikoyi 106104, Lagos State, Nigeria"

Changes to this document

This document will be reviewed on a yearly basis by our Data Protection Officer. If we make any changes, we will add a note to this page and if they are significant changes, we will let you know by email.