
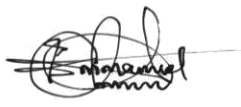




## DATA PRIVACY POLICY

| DATA PRIVACY POLICY |                   |   |  |
|---------------------|-------------------|---|--|
| PREPARED BY         | Anuri Iyalla      |  |  |
| APPROVED BY         | Managing Director |  |  |
| DATE                | August, 2024      |   |  |
| STATUS              | VERSION (VER 1.0) |   |  |

## **TABLE OF**

### **CONTENTS**

|   |          |
|---|----------|
| <b>1. Introduction</b>                          | <b>1</b> |
| <b>2. Objective</b>                             | <b>2</b> |
| <b>3. Scope and Applicability</b>               | <b>2</b> |
| <b>4. Interpretation</b>                        | <b>2</b> |
| <b>5. Policy</b>                                | <b>3</b> |
| <b>6. Responsibility of Data Subject</b>        | <b>3</b> |
| <b>7. Consent</b>                               | <b>3</b> |
| <b>8. Use/Processing of Data Subject's Data</b> | <b>4</b> |
| <b>9. Third-Party Disclosure</b>                | <b>4</b> |
| <b>10. Data Confidentiality Rights</b>          | <b>5</b> |
| <b>11. Cookies</b>                              | <b>5</b> |

## **1. Introduction**

This Privacy Policy is developed by Ogaboss App in compliance with the Nigerian Data Protection Regulation 2019 and other similar regulations as well as a demonstration of the Company's commitment to provide its customers and other stakeholders with highest level of protection of their personal data obtained in the course of interacting with the Company.

## **1. Objective**

This Privacy Policy has been put in place to:

- a. Inform data subjects about their rights, responsibilities, and privileges.
- b. Ensure the protection of Client and other Stakeholder's information.
- c. To ensure confidentiality as much as possible.
- d. Take corrective action if wrongdoing is discovered.

## **2. Scope and Applicability**

This Policy applies to all employees, clients and stakeholders of the Company. This policy highlights the basis on which personal data collected from Clients and other stakeholders shall be processed by the Company. This policy applies to the Company's website and physical contact with the Company regardless of how you access or use them. By continuing to visit our website, users of the website accepts and consent to the practices described in this policy.

## **3. Ownership, Review and Approval**

The Head of Data Protection shall be responsible for the development and maintenance of the data protection policy. The policy shall be reviewed periodically in line with the provisions of extant Data Protection laws.

Final approval of this policy lies with the Managing Director of the Company.

## **4. Interpretation**

- i. **Personal Data:** This means any information relating to an identified or identifiable natural persons (Data Subject); an identifiable natural person is one who can be identified, directly or indirectly.

- ii. **Data Subject:** This refers to all person who can be identified, directly or indirectly, via an identifier such as a name, an ID Number, Location data, etc.
- iii. **Personal Identifiable Information (PII):** This means information that can be used on its own or with other information to identify, contact or locate a single person, or to identify an individual In a context.
- iv. **Processing:** This means any operation or set of operations which is performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, use, disclosure by transmission, etc.

## 5. Policy

This Privacy Policy describes your privacy rights with respect to personal information which the Company may collect, use, store, or otherwise process when you engage our services. It applies to the Company's website and all database, applications, services, products, and physical contact with us, regardless of how you access or use them.

## 6. Responsibility of Data Subject

- a. Usernames, identification codes, passwords, or any other piece of information used as part of our access security measures must be treated as confidential and must not disclose to any third party.
- b. We reserve the right to disable any user identification code or password, whether chosen or allocated by the Company at any time, if in the Company's opinion, there has been non-compliance with any of the provisions of this privacy policy.
- c. All enquires, complaints or suspicion of a data breach should be forwarded to [hello@ogaboss.io](mailto:hello@ogaboss.io) or [support@ogaboss.io](mailto:support@ogaboss.io)

## 7. Consent

You accept this privacy policy when you give consent upon access to the Company's platforms, or use of the Company's services, features, technologies, or functions offered on our App. The Company may amend this privacy policy at any time by posting a revised version on its App or website or placing such notice at conspicuous points at its office.

## **8. Use/Processing of Data Subject's Data**

During onboarding (electronically) and when you use our website, we collect information such as website visits, identification documents (driver's license, BVN, NIN, Passport, etc), documents reflecting personal information such as name, address, passport details, identification numbers, telephone number, occupation, as is necessary. In the course of carrying out our due diligence as required by our Regulators, we may also use information obtained from third parties such as friends, employers, regulators, and publicly available sources such as the press, public search engines, etc.

The Company will only collect personal data in order to give efficient, enjoyable, and secure services. We may use your information to:

- a. provide necessary services and support
- b. process applications and send notices about transactions to requisite parties
- c. verify your identity
- d. manage risk, or detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities
- e. detect, prevent, or remediate violation of laws, regulations, standards, guidelines and frameworks
- f. improve the NITDA Services by implementing aggregate customer or user preferences
- g. measure the performance of the NITDA Services and improve the content, technology and layout
- h. track information breach and remediate such identified breaches
- i. manage and protect our information technology and physical infrastructure; or
- j. contact you at any time through your provided telephone number, email address or other contact details.

## **9. Third-Party Disclosure**

As a policy, the Company does not share its Clients or other stakeholder's information with third parties (unless with prior obtained approval of the data subject) except for website hosting partners and other parties who

assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to

keep this information confidential. We may also disclose the personal information of Data subjects under Regulatory requirements. However, non-personally identifiable visitor information may be provided to other parties in some limited cases.

## **10. Data Confidentiality Rights**

- a. Your information is regarded as confidential and will not be divulged to any third party, except under legal and/or regulatory conditions.
- b. You have the right to request sight of, and copies of any and all information we keep on you, if such requests are made in compliance with the Freedom of Information Act and other relevant enactments.
- c. You also have the right to request for the correction of information we keep on you.
- d. While the Company is responsible for safeguarding the information entrusted to us, you are also required to practice appropriate security measures such as non-sharing of passwords and other platform login details.

## **11. Cookies**

Cookies are small text files stored on your computer or mobile devices whenever you visit a website. Cookies have many uses, such as memorizing your preferences to tailor your experiences while on our site– or to help us analyze our App traffic.

The Company uses cookies to improve your experience while on its App. We would like to let you know a few things about our cookies:

- Some cookies are essential to access certain areas of this site;
- We use analytics cookies to help us understand how you use our site to discover what content is most useful to you

■

## **Why and How We Use Cookies on Our Website**

We use cookies to improve your online activity session by making navigation easier and providing important security features.

When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device you use, Your mobile device's unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser you use, unique device

identifiers and other diagnostic data. We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device.

We use cookies to track the activity on Our Service and store certain information

We use Google Analytics to collect the following types of information from users who have JavaScript enabled on their browsers:

- Web browser used – software manufacturer, and version number
- Operating system
- Screen colours
- JavaScript support
- Flash version
- Screen resolution
- Network location and IP address
- Geographic data
- Hostname
- Connection bandwidth
- Time of visit
- Pages visited and dwell time on these pages
- Referring site
  - o The referring website URL
  - o Search engine query used

### **Cookie Category**

Some cookies are required to make our website work, but we need your consent to use others. The cookie categories are:

| Category                  | Description  |
|---------------------------|--|
| <b>Strictly Necessary</b> | These cookies are required to run our website, to keep it secure, and to obey regulations that apply to us. These cookies are essential even if a customer declines the collection of cookies. |
| <b>Functional</b>         | These cookies remember your region or country, language, accessibility options, and your settings.   |

**Performance** These cookies tell us how customers use our website. We study and profile this data to help us improve our products and performance

**Marketing** These cookies help us decide which products, services, and offers may be relevant for you. We may use this data to tailor the ads you see on our own and other websites and apps.

■

#### **What are your choices regarding cookies?**

You can choose to have your computer warn you each time a cookie is collected, or you can choose to turn off all cookies. Since browsers differ, we recommend that you access the Help Menu to learn the correct way to modify your cookies. e

If you turn your cookies off, some of the features that make your site, experience more efficient may not function properly.