

MASOBE BOOKS

Privacy Policy

Effective Date: January 2nd 2026

1. Introduction

Masobe (**we, our, us**) is a book publishing company dedicated to bringing beautiful and exciting stories from talented authors to your bookshelf.

We have created this Privacy Policy (“Policy”) to demonstrate our respect for your privacy and to disclose our information collection, sharing and processing practices, which are in line with the Nigeria Data Protection Act 2023 (NDPA), the General Application and Implementation Directive (GAID), and any other applicable data protection laws. Regardless of whether you provide us with your personal data via our website or mobile app (together our “Platforms”), we strive to honour your privacy preferences and process your personal data in compliance with the respective laws governing your location.

Your personal data refers to any information relating to you by which you can be identified, directly or indirectly, including by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to your physical, physiological, genetic, psychological, cultural, social, or economic identity.

2. Purpose of this Policy

This Policy is based on Nigerian privacy and data protection principles and requirements and is applied in view of our overarching desire to comply with the provisions of the NDPA and the GAID, to preserve the confidentiality of your personal data and to provide you with our services as effectively as possible within the bounds of the law.

This Policy applies to all personal data processed by us and is part of our approach towards full compliance. This Policy is applicable to all our services accessed by you, as well as in our interactions with you, including our processing of your personal data. All our staff are required to comply with this Policy.

This Policy outlines how we collect, use, and protect your personal data in our interactions with you and in accordance with the NDPA and the GAID.

3. Purpose of Processing and Lawful Basis

Purpose	Lawful Basis
Processing your personal data in order to provide you with access to our Platforms.	- Where it is in our legitimate interest to manage and run our business efficiently. - Where we have your consent to do so.

Purpose	Lawful Basis
	Where we have a contract in place with you, requiring our processing of your personal data.
Processing your personal data in order to provide you with access to our Platforms.	Where necessary to perform the contract we have with you.
Processing your personal data in order to respond to your inquiries via our support services.	- Where we have your consent to do so. - Where necessary to perform the contract we have with you. - Where it is in our legitimate interest to manage and run our business efficiently. - Where it is necessary to comply with a legal obligation placed on us by an existing law.
Processing your personal data is in order to provide you with our services or further to our engagement with you as a vendor or third-party service provider.	- Where necessary to perform the contract we have with you. - Where it is in our legitimate interest to manage and run our business efficiently.
To utilize cookies and to share your information with third-parties for advertising purposes.	- Where we have your consent to do so. - Where it is in our legitimate interest to manage and run our business efficiently.
To personalize your experience, improve the Services, and develop new features	It is in our legitimate interests to manage and run our business efficiently and consider future strategy.
For tax compliance purposes.	Where it is necessary to comply with a legal obligation placed on us by an existing law. Compliance with legal obligations for remittance of tax information and related purposes.

Where processing is based on consent, we shall obtain the requisite consent directly from you at the time of collection of your personal data. Where we access your personal data through a third-party who relies on your consent, we will ensure that the consent is freely given by you and obtained without fraud, coercion or undue influence.

By clicking on the 'Send Message' button on the 'Contact Us' section of our Platforms, you consent to the collection, retention, and use of your information as set forth in this Policy. If you do not agree to this Policy, you may exit and discontinue use of our Platforms.

You can withdraw your consent at any time, but such withdrawal shall not affect the lawfulness of processing based on consent given prior to the withdrawal.

4. Data Protection Principles

We comply with the data protection principles set out below. When processing personal data, we ensure that:

- it is processed lawfully, fairly and in a transparent manner;
- it is collected for specified, explicit and legitimate purposes;
- it is at all times adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- it is all times accurate and, where necessary, kept up to date and that reasonable steps are taken to ensure that personal data that is accurate, having regard to the purposes for which it is processed, is erased or rectified without delay;
- it is kept in a form which permits identification of data subjects (i.e. an individual to whom personal data relates) for no longer than is necessary for the purposes for which the personal data is processed; and
- it is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

5. The personal data We Collect

(a) We collect and process certain information about you through the services you use, such as our Platforms when you onboard as a user, join our waitlist, subscribe to our newsletter as a community member, contact us via web or through social media channels. The specific categories of personal data we may collect include, but are not limited to:

- i) **Contact Information:** This includes your name, date of birth, contact address, email address, phone number, professional details, nationality, state or province, and national identity number.
- ii) **Communication Data:** Information related to your interactions with us, including emails, support inquiries, and any feedback you provide.
- iii) **Financial Information:** This includes your bank account information, bank account name and number, bank verification number, mobile payment number, payment method preferences, and any other information you choose to provide.
- iv) **Usage Data:** We collect data about how you use our Platforms (such as literature preferences, device information and browsing history).

- v) **Device and Log Information:** We gather information about the devices you use to access our services, including device type, operating system, and unique device identifiers. Additionally, we collect log information, such as IP addresses, browser type, and access times, to improve our Platforms.
 - vi) **Geographical Data:** In some cases, we may collect information on your geographical location to provide location specific services.
 - vii) **Other Information:** Any additional information you provide to us voluntarily or that we collect, such as your potential value to our program, public information from publicly available sources, including open postings on social media.
- (b) We will always strive to minimize the collection of personal data to what is necessary for the intended purpose. Where applicable and required by law, we will obtain your consent before collecting certain categories of personal data. Our personal data collection is always conducted in accordance with the NDPA, GAID and best practices.
- (c) It is important to note that certain personal data may be necessary to provide you with our services, and refusal to provide such data may impact our ability to serve you effectively. We are committed to ensuring the security and confidentiality of your personal data, and our data processing activities are conducted in accordance with this Policy, the NDPA, and the GAID.

6. Recipients of personal data

We only share your personal data with third-parties when it is necessary to provide you with our services or to comply with legal or regulatory requirements. Your personal data may be shared with the following categories of recipients:

- (a) Our affiliates; and
- (b) Third-party partners

7. Rights of Data Subjects

We have processes in place to ensure that we can facilitate any request made by you to exercise your rights under the NDPA and the GAID. All staff have received training and are aware of your rights as a data subject. Our Data Protection Officer (DPO) working with other trained staff will ensure that all requests will be considered without undue delay and within one month of receipt as far as possible. The contact information of our DPO is indicated in Clause 14 below.

As a data subject, you have the following rights:

- (a) Your right of access - You have the right to request copies of your personal data.
- (b) Your right to rectification - You have the right to ask us to rectify your personal data, which is inaccurate, incomplete or misleading.
- (c) Your right to erasure - You have the right to ask us to erase your personal data held with us, and we will oblige your request without any undue delay, except where we have a

legal obligation to continue storing your personal data or where any other overriding factor applies.

- (d) Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal data.
- (e) Your right to object to processing - You have the right to object to our processing of your personal data on grounds relating to your particular situation and we will oblige your request without any undue delay, except where we have a legal obligation to continue processing your personal data or where any other overriding factor applies. Such legal obligation may include instances of any judicial proceedings, or regulatory authority which may require us to continue the processing of your personal data.
- (f) Right to request the transfer of your personal data to yourself or a third-party - We will provide your personal data to you, or (where technically feasible) a third-party data controller you have chosen, in a structured, commonly used, and machine-readable format.
- (g) Right to be informed of the existence of automated decision-making, including profiling, its significance and potential impact on you and your right to object to or challenge such processing.
- (h) Right to withdraw your consent - You may withdraw your consent by contacting us using the details set out in Clause 14 below. If you withdraw your consent, we may not be able to continue providing and/or performing the associated activity except where another lawful basis applies.
- (i) Right to lodge a complaint with the Nigeria Data Protection Commission (NDPC), where you are of the opinion that your personal data rights have been violated.
- (j) Right to be informed of the existence of automated decision-making, including profiling, its significance and potential impact on you and the right to object to or challenge such processing.

Please note that the specific timeframe for responding to requests may vary depending on the complexity of the request. Within one month of our receipt of your request, we will either respond or notify you if we require additional time to process your request.

8. Data Retention Period

We will retain your personal data in accordance with the NDPA for no longer than is necessary to achieve the purpose for which it was collected. We will also retain some personal data after your relationship with us has ended for archiving and record purposes. The retention period will be determined by various criteria, including:

- (a) the purpose for which we keep your personal data, e.g. to defend or take legal action;

- (b) if we have a legal obligation to retain personal data for a defined period, e.g., some laws and regulations may mandate that some personal data must be retained for a specific period; and
- (c) if we have to withhold destruction because of ongoing litigation, a court order or an investigation by law enforcement agencies or a regulator.

When your personal data is no longer necessary for the above purposes, we will securely destroy such information or de-identify it. For more information about our data retention practices, please see the “contact us” section on our Platforms.

9. Cross-border Transfers

We operate systems that may make your personal data accessible to our affiliates around the world and may often transfer your personal data to these affiliates. Where we share or transfer your personal data, we will do this in accordance with the NDPA, the GAID, and any applicable data protection laws and will take appropriate safeguards to ensure its protection. These include ensuring that:

- All recipients of personal data transferred to other countries are subject to a law, binding corporate rules, contractual clauses, code of conduct, or certification mechanism that affords an adequate level of protection with respect to the transferred personal data; or
- In the absence of the above, we only transfer personal data to other jurisdictions if:
 - (a) you have granted and not withdrawn consent to such transfer after having been informed of the possible risks of such transfers due to the absence of adequate protections;
 - (b) transfer is necessary for the performance of a contract to which you are a party or in order to take steps at your request, prior to entering into a contract;
 - (c) transfer is for your sole benefit and (i) it is not reasonably practicable to obtain your consent to that transfer, and (ii) if it were reasonably practicable to obtain such consent, you would likely give it;
 - (d) transfer is necessary for important reasons of public interest;
 - (e) transfer is necessary for the establishment, exercise, or defense of legal claims; or
 - (f) transfer is necessary to protect your vital interests or of other persons, where you are physically or legally incapable of giving consent.

10. How we Secure your personal data

We take ultimate responsibility for safeguarding your personal data as processed by us and maintaining its confidentiality and integrity. We implement robust security measures and follow industry best practices to protect your information from unauthorized access, disclosure, alteration, and destruction. Our security measures include:

- (a) Encryption: We use encryption techniques to protect personal data being processed by us, including in the course of transmitting same to third-parties. This ensures that your personal data remains confidential during transit.
- (b) Access Control: We restrict access to your personal data to authorized personnel only, and access is granted on a need-to-know basis. Our employees and third-party service providers are subject to strict confidentiality obligations.
- (c) Regular Security Audits: We conduct regular security audits and assessments of our systems and infrastructure to identify and address potential vulnerabilities.
- (d) Data Backup: We regularly back up your data to prevent data loss and ensure business continuity in the event of unforeseen circumstances.
- (e) Incident Response Plan: We have established an incident response plan to promptly address any data breaches or security incidents and to notify the appropriate authorities and affected individuals, as required by law.
- (f) User Authentication: We implement strong user authentication methods to ensure that only authorized users have access to your account and personal data.
- (g) Data Minimization: We only collect and retain the minimum amount of personal data necessary for the intended purpose, reducing the risk of unauthorized access and misuse.
- (h) Anonymization and Pseudonymization: Where applicable, we use anonymization and pseudonymization techniques to enhance data privacy and limit exposure of personal data.
- (i) Network Security: We implement firewall protection, intrusion detection systems, and secure network configurations to safeguard against external threats and unauthorized access.
- (j) Employee Training and Awareness: We conduct regular security awareness training for our employees to ensure compliance with data protection policies and best practices.

While we take every reasonable precaution to protect your personal data, it is important to acknowledge that no system can be entirely immune to security risks. We encourage you to take steps to safeguard your personal data, such as using strong and unique passwords, keeping your login credentials confidential, and promptly reporting any suspicious activity.

In the event of a personal data breach that could result in a high risk to your rights and freedoms, we will notify you and the appropriate regulatory authorities in accordance with legal requirements. Our commitment is to continuously enhance our security practices to ensure the safety of your personal data. A personal data breach would be where there is a breach of security leading to or likely to lead to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

11. Automated Decision-Making and Profiling

We may employ automated decision-making and profiling processes to provide you with our services by utilizing algorithms and data analysis to assess the information you provide to us. The purpose of these automated processes is to make well-informed decisions that enhance our services and ensure they meet your specific needs.

You have the right to object to the use of automated decision-making and profiling processes.

12. AI Features (Koko AI)

Masobe may use AI-powered tools such as Koko AI to enhance book discovery and user experience. AI interactions may be processed to improve recommendations, but are not used to personally identify users.

13. Third-Party Links

Our Platforms may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Platforms, we encourage you to read the privacy policy of every website you visit.

14. Cookies

What is a cookie? Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device, preferences and generally help to improve your online experience.

By using our website, you agree that we can place these types of cookies on your device. If you want to restrict or block our use of cookies, you should do this through the web browser settings for each browser you use and on each device you use to access the internet. Please be aware that some of areas of our website may not function properly if you restrict or block cookies. However, you can allow cookies from specific websites by making them "trusted websites" in your web browser. The "Help" function within your web browser should tell you how to make these changes.

15. Contact Us

If you have any questions, concerns, or requests regarding your personal data or this Policy, please contact us via:

Address: 34 Gbajumo Close, off Adeniran Ogunsanya, Surulere, Lagos, Nigeria
Email: Support@masobebooks.com
Phone: +234 701 838 3286

16. Right to Lodge a Complaint

If you believe that your data privacy rights have been violated, you have the right to lodge a complaint with the [Nigeria Data Protection Commission](#) at:

Address: No. 12, Dr. Clement Isong Street, Asokoro, Abuja, Nigeria.

Email: info@ndpc.gov.ng

Telephone: +234 (0) 916 061 5551

17. Changes to this Policy

We reserve the right to update or modify this Policy to reflect changes in our data processing practices or legal requirements. We will notify you of any material changes by posting the updated Policy on our Platforms or by other means of communication, where appropriate. We encourage you to review this Policy periodically to stay informed about how we are processing your personal data.