

## **RANK - PRIVACY POLICY**

### **INTRODUCTION**

**Rank Capital Limited** (“Rank”, “we” “our” “us”) values your privacy and the security of the information you share with us. This Privacy Policy explains how we collect, use, disclose and safeguard the information we obtain from you in relation to your use of our website, product or services. It applies to our website and all related sites, applications, services and tools regardless of how you access or use them.

By using our website, products, or services, you consent to the terms and practices contained in this Privacy Policy and you grant us the right to collect and process your data in accordance with the terms of this Policy.

Our website and services are not directed to children under 18. We do not knowingly collect information from children under 18. If as a parent or guardian, you become aware that your child or ward child has provided us with any information without your consent, please contact us through the details provided in this Privacy Policy.

### **THE INFORMATION WE COLLECT**

When you use our website or service, we may collect certain types of information about you including the following:

#### **Information you provide to us**

This includes but is not limited to your personal data (such as your full name, phone number(s), email address, home or office addresses, product and service preferences, and responses) bank verification number for registration and compliance purposes.

#### **Information we collect automatically**

This includes but is not limited to your IP address, browser type, mobile device ID, device type, operating system version, connection information, mobile network information, location derived from GPS-enabled services, information based on your usage of the service such as time, date and duration of your use, referral URLs, search terms and search history, camera, contact list, browsing history, purchase history and advertisement interactions.

#### **Information we obtain from 3<sup>rd</sup> Parties**

We may retrieve additional personal information about you from third parties and other identification/verification services such as your financial institution and payment processor. With your consent, we may also collect additional Personal Information in other ways including emails, surveys, and other forms of communication. Once you begin using our services through your Rank account we will keep records of your transactions and collect information of your

other activities related to our services. We will not share or disclose your Personal Information with a third party without your consent except as may be required for the purpose of providing you with our services or under applicable legislation.

In providing you with the services, we may rely on third-party servers located in foreign jurisdictions from time to time, which as a result, may require the transfer or maintenance of your personally identifiable information on computers or servers in foreign jurisdictions. We will endeavour to ensure that such foreign jurisdictions have data protection legislation that is no less than the existing data protection regulations in force in Nigeria and your personally identifiable information is treated in a safe and secure manner.

## **WHY WE COLLECT YOUR INFORMATION**

We collect your information to ensure your easy and seamless access to our services. We use the information we collect for the following purposes:

- i. To enable us to provide you with a personalized experience of our product and services.
- ii. To communicate with you and provide you with information on our Services, such marketing content, newsletters and service update. However, we will provide you with an option to unsubscribe if you do not want to hear from us
- iii. To provide support services to you.
- iv. To process your orders and requests.
- v. To analyse and understand your use of our products and services.
- vi. To protect against illegal, malicious, and fraudulent activity.
- vii. To analyse and improve the quality of our services and offerings.
- viii. To facilitate your interactions with our social media platforms.
- ix. To analyse and learn about our users' demographics, interests, and behaviour.
- x. To identify and repair errors and bugs on our platforms.
- xi. To facilitate dissemination of information about our services and our partners.

## **SHARING YOUR INFORMATION WITH THIRD PARTIES**

We may sometimes share the information we have collected from you with third parties. These third parties include our affiliates, subsidiaries, partners, third-party vendors and suppliers who render services for us or on our behalf and our professional advisers (such as our auditors, accountants, lawyers, etc.). We may share the information to facilitate the seamless delivery of our services or in compliance with applicable legal requirements and assisting law enforcement agencies by responding to requests for the disclosure of information in accordance with local laws.

## **COOKIES**

We use cookies to identify you as a User and make your user experience easier, customise our services, content and advertising; help you ensure that your account security is not compromised, mitigate risk and prevent fraud; and to promote trust and safety on our website.

Cookies allow our servers to remember IP addresses, date and time of visits, monitor web traffic and prevent fraudulent activities.

Our cookies never store personal or sensitive information; they simply hold a unique random reference to you so that once you visit the site we can recognize who you are and provide certain content to you.

If your browser or browser add-on permits, you have the choice to disable cookies on our website, however this may impact your experience using our website.

## **GOVERNING PRINCIPLES OF DATA PROCESSING**

We process your information in accordance with the provisions of the Nigeria Data Protection Regulation and these principles:

- i. Your personal data is collected and processed in accordance with specific, legitimate and lawful purpose consented to by you, provided that further processing may be done by archiving the data for public interest, scientific or research purposes, or statistical purposes.
- ii. The data collected is adequate, accurate and without prejudice to the dignity of the human person.
- iii. The data collected is stored only for the period within which it is reasonably needed.
- iv. The data collected is secured against all foreseeable hazards and breaches such as theft, cyberattack, viral attack, dissemination, manipulations of any kind, damage by rain, fire or exposure to other natural elements.
- v. We owe a duty of care to you in respect of the data we have obtained from you.

## **HOW WE SAFEGUARD YOUR INFORMATION**

We use reasonable efforts to safeguard the confidentiality of all personal data that we process relating to You and regularly review and enhance our technical, physical and managerial procedures so as to ensure that Your personal data is protected from unauthorised access, improper use or disclosure, unauthorised modification, and unlawful destruction or accidental loss.

In this respect, kindly be informed that We have implemented security policies, rules as well as technical measures to protect the personal data that We have under Our control. All Our employees and data processors, who have access to and are associated with the processing of personal data, are further obliged to respect the confidentiality of Our visitors' personal data.

When You enter sensitive information (such as credit card, bank account or proprietary business information), We encrypt the transmission of that information using secure socket layer technology (SSL) as a security measure.

In addition to the security measures we employ, you must also ensure that you take responsibility for the protection of your personal information. We will not be liable for any loss or

damage caused by the activities of hackers and fraudsters when we have taken all necessary and reasonable steps to protect your information in our possession. You are fully responsible for safeguarding your username, password, and financial information.

## **LINKS TO THIRD PARTY WEBSITES**

Our website, products and services may contain links to other websites not subject to this Privacy Policy. When you access those websites, they may collect your personal information in accordance with their privacy and data collection policies. We are not responsible for the data collected by these third parties and you are advised to study their privacy policies before you make use of their services.

## **YOUR PRIVACY RIGHTS**

By providing us with your personal information, you have certain rights in accordance with the provisions of the Nigeria Data Protection Regulation which include

- the right to request for your personal data in our possession,
- the right to object to the processing of your personal data,
- the right to request rectification and modification of Personal Information which Rank keeps; and
- the right to request for the deletion of your personal data in our possession. To exercise any of the rights listed here, please contact us through the details provided below.

All such requests will be reviewed and considered in accordance with the provisions of the applicable data protection regulations.

You also have the right to opt-out of receiving the informative materials we send to our users by clicking the “Unsubscribe” button found at the bottom of such emails. You also have the right to decline to provide your personal Information when it is requested, however, certain services or all the services may be unavailable to you.

## **INTERNATIONAL TRANSFER OF YOUR INFORMATION**

We may need to transfer your information in our possession to third parties outside Nigeria. Such transfers will only be done in accordance with the applicable data protection regulations. While undertaking the international transfer of your information, we will put security measures in place to reasonably protect your data during transmission. We shall, among other things, confirm whether the country is on the National Information Technology Development Agency (“NITDA”) White List of Countries with adequate data protection laws

## **DATA RETENTION PERIOD**

We will retain your information for as long as your account is active or as needed to provide our services to you, comply with our legal and statutory obligations or verify your information with a financial institution.

Rank is statutorily obligated to retain the data you provide us with in order to process transactions, ensure settlements, make refunds, identify fraud and in compliance with laws and regulatory guidelines applicable to us, our banking providers and card processors.

Therefore, even after closing your Rank account, we will retain certain Personal Information and transaction data to comply with these obligations. All Personal Information shall be destroyed by Rank where possible. For all Personal Data and records obtained, used and stored by Rank, we shall perform periodical reviews of the data retained to confirm the accuracy, purpose, validity and requirement to retain.

The length of storage of Personal Information shall, amongst other things, be determined by:

- the contract terms agreed between Rank and the Data Subject or as long as it is needed for the purpose for which it was obtained; or
- whether the transaction or relationship has statutory implication or a required retention period; or
- whether there is an express request for deletion of Personal Data by the Data Subject, provided that such request will only be treated where the Data Subject is not under any investigation which may require Rank to retain such Personal Data or there is no subsisting contractual arrangement with the Data Subject that would require the processing of the Personal Data; or
- whether Rank has another lawful basis for retaining that information beyond the period for which it is necessary to serve the original purpose.

## **CONTACT DETAILS**

If you have any question, request or complaints, or you require further information not already provided in this Privacy Policy, please contact us by sending an email to [hello@moni.africa](mailto:hello@moni.africa).

We maintain a data breach procedure in order to deal with incidents concerning Personal Information or practices leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Information transmitted, stored or otherwise processed. You may contact our DPO upon becoming aware of any breach of Personal Information or if your access credentials have been compromised, to enable us to take the necessary steps towards ensuring the security of your Personal Information or account.

## **UPDATES TO THIS POLICY**

We reserve the right to periodically update and modify the terms of our Privacy Policy without notice. Changes to this Privacy Policy will take effect on the last updated date.

**Last updated June 27, 2022**

