

# Agesta CGA

## Privacy Policy

*Last updated: 7 september 2026*

This Privacy Policy explains how Agesta CGA (“Agesta,” “we,” “our,” or “us”) collects, uses, stores, and protects information when you use the Agesta CGA mobile and web application (the “App”). Agesta CGA is a professional tool used by shop owners and their staff (“agents,” “users,” or “you”) to manage TV subscription top-ups and bill payments for services such as DSTV, Canal+, Netflix, Disney+, and StarTimes, and to track related finances, commissions, and activity.

This document is a draft based on a technical review of the App's code and data structures. It should be reviewed by a qualified lawyer before publication, and the bracketed placeholders (company name, address, contact email, jurisdiction, effective date) should be completed before use.

### 1. Information We Collect

Because Agesta CGA is an internal business tool rather than a consumer app, most of the information it processes is provided directly by agents and administrators in the course of using the App. We do not collect data from App visitors who are not registered users.

| Category                    | Examples                                                                                                                                                              | Why we collect it                                                                          |
|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Account information         | First name, last name, username, password (stored encrypted), optional email address, phone number                                                                    | To create and secure your account and let you log in                                       |
| Shop / business details     | Shop name, shop address, role (agent, finance, admin, etc.)                                                                                                           | To identify which shop or agent a transaction belongs to and apply the correct permissions |
| Transaction & billing data  | Subscription/decoder card number, package selected, subscription duration, date and time, price, payment status                                                       | To process and track subscription top-ups and bills                                        |
| Financial & commission data | Balances, transfers between agents, commission records, exchange rates, capital and audit records                                                                     | To operate the App's internal finance and accounting features                              |
| Notifications data          | Push notification token, in-app notification content and read status                                                                                                  | To deliver alerts about bills, payments, and account activity                              |
| Activity logs               | Actions taken in the App (e.g., creating a user, confirming a bill, adjusting a balance), the acting user's name and role, timestamp, and a description of the change | To maintain an audit trail for accountability, dispute resolution, and fraud prevention    |
| Device & technical data     | Device type (used to confirm you're on a physical device for push notifications), app version, general technical logs                                                 | To operate push notifications and to diagnose and fix technical issues                     |

We do not collect payment card numbers, bank account details, government identification numbers, or precise location data. The “card number” referenced above is the subscriber's decoder/subscription card number for services like DSTV or Canal+, not a bank or credit card number.

### 2. How We Use Information

We use the information described above to:

- Create, authenticate, and manage user accounts and permissions
- Process and confirm subscription bills and payments
- Calculate and record agent balances, transfers, and commissions
- Send push and in-app notifications about bills, payments, and account activity

- Maintain activity logs for security, accountability, and audit purposes
- Detect, investigate, and prevent fraud, errors, or misuse of the App
- Provide customer support and respond to account-related requests, including password resets
- Maintain and improve the App's reliability and performance

### **3. Legal Basis for Processing**

Where applicable law requires a legal basis, we rely on: performance of the agreement between you (or your employer) and Agesta to provide access to the App; our legitimate interests in operating a secure, auditable finance tool; and, where relevant, compliance with legal obligations (for example, financial record-keeping).

### **4. Password & Account Security**

Passwords are stored in encrypted (hashed) form and are not accessible to Agesta staff in plain text. If you use the code-based password reset flow, a temporary verification code is sent to the email address on file; this code is stored only for the duration of the reset attempt and is deleted once the reset is completed or the code expires.

### **5. Sharing of Information**

We do not sell your personal information. We may share information in the following limited circumstances:

- With administrators and finance staff within your own organization, as needed to operate shared features such as balances, transfers, and reports
- With service providers who help us run the App (for example, push-notification delivery and cloud database hosting), under obligations to protect your data
- Where required by law, regulation, legal process, or governmental request
- To protect the rights, property, or safety of Agesta, our users, or others, including to investigate suspected fraud
- In connection with a merger, acquisition, or sale of assets, subject to this Policy or a successor policy

### **6. Data Retention**

We retain account, transaction, and activity-log data for as long as your account is active and for a reasonable period afterward, as needed for accounting, audit, dispute-resolution, and legal purposes [insert specific retention period(s)]. Activity logs are retained even after a related account is deleted, so that historical records remain accurate; in that case, the log keeps the acting user's name and role as they were at the time of the action, rather than a live link to the deleted account.

### **7. Your Rights**

Depending on your location and applicable law, you may have rights to access, correct, or request deletion of your personal information, to object to or restrict certain processing, or to request a copy of your data. To exercise any of these rights, contact us using the details in Section 12. Note that some information, such as financial and activity records, may need to be retained even after a deletion request in order to meet legal or accounting obligations.

### **8. Children's Privacy**

Agesta CGA is a business tool intended for use by adult agents and administrators. It is not directed at children, and we do not knowingly collect information from children.

### **9. International Data Transfers**

Your information may be processed and stored on servers located in a country other than your own. Where this occurs, we take steps to ensure appropriate safeguards are in place, consistent with applicable law. [Insert details of hosting location(s) and any transfer mechanisms used.]

## **10. Data Security**

We use reasonable technical and organizational measures to protect the information in the App, including encrypted password storage and access controls based on user roles. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security.

## **11. Changes to This Policy**

We may update this Privacy Policy from time to time to reflect changes in the App or our practices. We will update the “Last updated” date above when we do, and, where changes are significant, we will provide additional notice within the App.

## **12. Contact Us**

If you have questions about this Privacy Policy or how your information is handled, please contact us at:

- Company: AGESTA
- Address: Bujumbura, ngagara, n56
- Email: [agestaoffice@gmail.com](mailto:agestaoffice@gmail.com)
- Phone: +243979595336