

DATA PROTECTION POLICY

Types Of Personal Data And Other Information Collected.

We collect different types of Personal Data and other Information from the visitors to our website voluntarily. The collection of Personal Data and other Information is to provide and improve our Service to you, and such Personal Data and other Information includes but is not limited to:

- **Personal Identification Data:** While using our Service, we may ask you to provide us with certain personally identifiable information that we can use to contact or identify you. These include but are not limited to the full name, date of birth, nationality, cellphone or mobile number, email address, place of residence (and/or proof of residence), employment status, the industry of employment and/or national identification number ("Personal Identification Data").
- **Usage Data:** We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

Address:

6, Asabi Aderoumu Street,
Alaso, Alagbado,
Lagos, Nigeria.

Contact:

info@mavapay.co
+2348146810457
+2347080181620

- Tracking & Cookies Data: We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with a small amount of data including a unique anonymous identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and improve and analyze our Service. You can instruct your browser to accept or refuse all cookies or indicate when a cookie is being sent. However, if you do not accept cookies, you may not experience and use some portions of our Service. Examples of Cookies we use:
 - Session Cookies: We use Session Cookies to operate our Service.
 - Preference Cookies: We use Preference Cookies to remember your preferences and various settings.
 - Security Cookies: We use Security Cookies for security purposes.
- Information for purposes of biometric identification, such as the selfie you provide to us when creating your Mava Pay account;
- National identity documentation such as a copy of your national identity card, drivers' license or passport and/or any other information deemed necessary to comply with our legal obligations under financial or anti-money laundering laws;
- Transaction information such as your transaction data on your Mava Pay account and information on the recipient of any transaction(s);
- Correspondence such as information provided to us when engaging with our customer support and/or responses to our surveys;

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- Device and location information such as, geolocation information, browser name and version information, IP address information, device fingerprint data, authentication data and/or clickstream data.

How We Collect Your Data

We collect your Personal Data and other Information from public and non-public sources through:

- your direct disclosures to us when you onboard on our platform, use our Services or access our platform;
- your communication to us through our customers support channels, email, chat, telephone, or any other means;
- your reading of our emails or notices, online research on social media and websites which may not be publicly available;
- investigations on publicly available databases in furtherance of our compliance obligations;
- your participation in surveys which we make available to you, competitions and promotions;
- your usage of the Mava Pay platform (we collect Information on your transactions and usage of your Mava account); and
- third parties such as identity verification services, credit reference agencies, regulatory and enforcement agencies, and public sources.

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The Personal Data and other Information collected is internally reviewed, used to improve the content of our website, notify our visitors of updates, and respond to visitor inquiries. Once your Personal Data and other Information is reviewed, it is discarded or stored in our files for the period it is reasonably needed.

If we make material changes in collecting Personal Data or other Information highlighted above, we will inform you by placing a notice on our website or application. Personal Data received from any visitor will be used only for internal purposes and will not be sold or provided to third parties (except necessary under an Agreement between Mava Pay and a Service Provider).

Use/Processing of Personal Data

We will only process your Personal Data to carry out our lawful business activities. In doing so, we rely on one or more of the following lawful grounds for processing your Personal Data:

Contractual necessity: We may process your Personal Data where it is necessary for us to provide our products and services to you or to otherwise comply with our obligations under Mava's Terms of use.

Consent: In some cases, we will only process your personal data where you provide us with your express consent for such processing.

Legal obligation: In some cases, we may need to process your Personal Data to comply with an obligation imposed by law.

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More specifically, we may process your personal data for one or more of the following purposes.

- to verify your identity, following Know Your Customer (KYC), Anti-Money Laundering, Combating the Financing of Terrorism (AML/CFT/CPF) requirements;
- to manage and maintain your account with us;
- to detect and prevent fraudulent or unauthorized use of our products and services;
- to better manage our business and your relationship with us, including for purposes of quality control and staff training to make sure we continue to provide you with accurate information, products and services;
- to improve our products and services, and to develop new products and services;
- to notify you about benefits and changes to the features of our products and services;
- to provide you with personalized advertising and marketing;
- to respond to your enquiries and to resolve disputes; and
- concerning legal claims, compliance, audit, risk management, law enforcement processes and regulatory functions; in connection with the acquisition, merger or sale of a business.

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Transfer of Data

Your Information, including Personal Data, may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those from your jurisdiction.

Your consent to this Privacy Notice and your submission of such Information represents your agreement to that transfer. BDL will take all steps reasonably necessary to ensure that your Information is treated securely and in accordance with this Privacy Notice. Any Personal Data you provide to us, including and similar to your name, address, telephone number and e-mail address, will not be released, sold, or rented to any entities or individuals except in accordance with this Privacy Notice, our privacy policy and applicable law.

Your Rights Over Your Data

You have certain rights/control over the Personal Data or other Information you submit to us and those that we collect from third-party sources. This includes the right:

- to access and confirm your Personal Data held by Mava Pay;
- to withdraw consent from or object to the processing of your Personal Data (this does not affect already processed Information);
- to rectify or update any inaccurate or outdated Personal Data;
- to know the purpose for processing your Personal Data;
- to restrict the processing of your Personal Data;

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- to request for erasure of any Personal Data Mava Pay holds about you, if any, subject to the provisions of applicable law;
- to request a copy of the Personal Data Mava pay Pay keeps about you;
- to object/refuse access to your Personal Data for direct marketing; and
- to contest the accuracy of your Personal Data or other Information. Where this is done, Mava Pay shall have the right to a specified period to verify the accuracy of the Personal Data or other Information.

At your request, Mava Pay will provide your Personal Data or other Information, in a structured manner, commonly used and machine-readable format to you.

We will not hinder you from transmitting your Personal Data or other Information in our database to another company where the processing is based on consent, on a contract, and processing is carried out by automated means in compliance with applicable laws.

We will execute your requests on the transmission of your Personal Data or other Information to another company, where technically feasible.

How To Exercise Your Rights

When you make a request to exercise any of the above rights, we will provide you with your Personal Data and other necessary Information you request. However, we reserve the right to charge you or refuse your request where we notice that the request is repetitive or excessive. For the purpose of this notice, four consecutive requests would be deemed repetitive and excessive.

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Your right to the erasure of your Personal Data does not apply to legal necessities like invoices, audit logs, subscription information, and the Personal Data archived on Mava's backup systems which we shall securely isolate and protect from any further processing to the extent required by applicable law.

Where any of your rights as provided for under this Privacy Notice is breached, resolution shall be in accordance with the provision of our Terms of Service, provided that you can only apply for a remedy within a period of 2 years within which the breach occurred.

Security Of Personal Data

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

Disclosure of Personal Data

We may share your personal data with:

- Any person that works for Mava;

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- Financial and other institutions we partner with to provide our products and services;
- Companies and organizations that provide third-party services to us, including technical infrastructure, marketing and analytics, and web and app development;
- Companies and organizations that assist us with identity verification, background screening and due diligence.
- Our professional advisers, consultants and other similar services.

We will otherwise treat your personal data as private and confidential and will not share it with other parties except:

- Where you have permitted us to do so;
- Where we believe it is reasonably necessary to comply with any law, regulation, legal process or governmental request, to enforce our Terms of use or other agreements, or to protect the rights, property, or safety of us, our customers or others;
- Where we may transfer rights and obligations according to our agreement with you.

Service providers

We may employ third-party companies and individuals to facilitate our Service ("Service Providers"), provide service on our behalf, perform Service-related services, or assist us in analyzing how our Service is used.

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These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.



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