



DATA PRIVACY POLICY

MARCH 2025

Version 2.0

Document Ref.	NDPA/TWD/Data Protection/2025
Document Title	Data Privacy Policy
Version:	2.0
Dated:	March 2025
Document Author:	DPO
Document Owner:	TWD_Data Protection Officer

Document History

Prepared By	Version	Date	Signature	Comment
Shalom Enikele	2.0	March 2025		

Document Review/Approval

Reviewed By	Designation	Signature	Date
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Monday Ogbemudia	CCRO		April-2025
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Distribution

Name	Title	Date
All Staff	First Draft	

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Monday Ogbemudia	CCRO		April-2025
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TRANSACTWORLD DIGITAL SERVICES NIGERIA

LIMITED

PRIVACY POLICY

Introduction

We are Transactworld Digital Services Limited (“TWD”), a Nigerian Company with offices at **The Post Square, plot 1039, Adeola Odeku st, Victoria Island, Lagos.** with company number **1827681**.

For any access requests, questions, or inquiries about how we use your personal information, please contact us at privacy@transactworlddigital.com.

TWD does not take your trusting us with your information lightly. The privacy of our users is of paramount interest to us, and we are committed to protecting it.

This privacy policy document describes the privacy rights of our users and stipulates the manner in which we collect, use, store, share and protect your information across our website, payment platforms (“Platforms”), APIs, software applications (“Apps”), email notifications and tools irrespective of how you use or access them.

This privacy policy document is applicable to all of the website, software applications (“Apps”) and/or payment platforms (“Platforms”) offered by TWD.

Objective

This privacy policy document is for the primary purpose of providing all persons and organisations whose Personal Information we hold and collect, the purposes for which we collect said Personal Information, the other parties with whom we may share it and the measures we take to protect the security of the data.

As such, we have developed this privacy policy to help our users understand how we collect, use, communicate, disclose, and otherwise use personal information. We have outlined our privacy policy below.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our website, including information:

- By which you may be personally identified, such as full name, home address, email address, IP address, date of birth, telephone number, gender, driver's license, international passport, or other national identification numbers ("**personal & contact information**"). This data is to allow us to ascertain your identity in order to contact and offer our services to you and to further ascertain your eligibility to use our services in accordance with regulatory requirements on Know Your Customer (KYC) directives.
- About your business, such as entity legal name, physical address, phone number, legal entity type, industry, organisation documents (e.g. memorandum and articles of association), employer corporate entity number, or other information, which may include Information as provided above, or additional information we may additionally request you to provide ("**corporate information**");
- About financial information such as Bank Verification Number (BVN), personal or corporate account number of users, location date and the total amount of transaction, and other information provided by financial institutions or users when we act on their behalf, ("**Financial Data**");
- About information relating to a payment when you, as a merchant (using one or more of our payment processing services) or as a customer, are using our products or services ("**Transaction Data**");
- About records of your decision to subscribe or to withdraw from receiving marketing materials from us or from our third parties ("**Marketing Communications Data**");
- About non-personal information or anonymised data, such as statistical or demographic data.

How we collect this information:

- When you sign up for a TWD account.
- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies.
- Contact our customer support team.

- Use any of our services.

Information You Provide to Us

The information we collect on or through our website may include:

- Information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our website, subscribing to our service, or requesting further services. We may also ask you for information when you report a problem with our website.
- Records and copies of your correspondence (including email addresses), if you contact us.
- Details of transactions you carry out through our website.
- Your search queries on the Website.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically may include personal information, and we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our website and to deliver a better and more personalised service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customise our website according to your individual interests.
- Speed up your searches.
- Recognise you when you return to our website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you direct your browser to our website.
- **Flash Cookies.** Certain features of our website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- **Web Beacons.** Pages of our website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permits TWD, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our website and its contents to you.
- To provide, administer, and communicate with you about information, products, or promotions of TWD, and services that you request from us.
- To fulfil any other purpose for which you provide it.
- To provide you with notices about your account.
- Process your payment transactions (including authorisation, clearing, chargebacks and other related dispute resolution activities);
- Protect against and prevent fraud, unauthorised transactions, claims and other liabilities;
- To target advertisements, newsletter and service updates;
- As necessary to establish, exercise and defend legal rights;
- As may be required by applicable laws and regulations, including for compliance with Know Your Customers and risk assessment, Anti-Money Laundering, anti-

corruption and sanctions screening requirements, or as requested by any judicial process, law enforcement or governmental agency having or claiming jurisdiction over TWD;

- To use data analytics to improve our Website, products or services, user experiences and to optimise service.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our website or any products or services we offer or provide through it.
- To verify your identity and fulfil our legal and regulatory obligations.
- In any other way we may describe when you provide the information.
- For any other purpose for which we will provide specific notice at the time of collection with your consent.

As a principle, we do not collect any special categories of personal information. If we do collect special categories of personal information, we will ensure compliance with applicable law.

This privacy policy document applies to TWD services only. We do not exercise control over the sites displayed or linked from within our various services. These other sites may place their own cookies, plug-ins or other files on your computer, collect data or solicit personal information from you. TWD does not control these third-party websites, and we are not responsible for their privacy statements. Please consult such third parties' privacy statements and set appropriate controls in your settings when using any third-party services.

Disclosure of Your Information

We may disclose aggregated information about our users and information that does not identify any individual, without restriction.

We may disclose personal information that we collect, or you provide, as described in this privacy policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business, and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.

- To our partner bank(s) in order to comply with laws and regulations governing banking data.
- To the partner brand on behalf of which we are providing services to you.
- To fulfil the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent, we may also disclose your personal information:
 - To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
 - To enforce or apply our terms of use and other agreements, including for billing and collection purposes.
 - If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of TWD, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

Data security and Retention

The security of your personal information is important to TWD. We are committed to protecting the information we collect. We maintain administrative, technical and physical controls designed to protect the personal information you provide, or we collect against loss or theft, as well as against any unauthorised access, risk of loss, disclosure, copying, misuse or modification.

Other security measures include, but not limited to, secure servers, firewall, data encryption and granting access only to employees in order to fulfil their job responsibilities.

The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we make efforts to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

Furthermore, we will only retain personal information on our servers for as long as is reasonably necessary, as long as we are providing Services to you. When you close your Account, your information is stored on our servers to the extent necessary to comply with regulatory obligations and for the purpose of fraud monitoring, detection and prevention. Where we retain your Personal Information, we do so in compliance with limitation periods under the applicable law.

Marketing Initiatives

We may process your Personal Information in order to contact you or send you marketing content and communication about our products, services or surveys. You may exercise your right to either object to receiving such contact from us or opt out of the marketing content after agreeing to receive the same. Please note, however, that if you opt out of marketing content, you may still receive messages from us relating to transactions and our services related to our ongoing business engagement.

We may ask you for permission to send notifications to you. Our Services will still work if you do not grant us consent to send you notifications.

Data Protection Rights and Choices of Users

Based on your location and applicable laws, please find below the rights you have as a user in relation to your personal information:

- Right to be informed.
Right to be informed of the existence of an automated decision-making, profiling system, the significance and envisaged consequences of the same, and the right to object to and/or challenge such processing.
- Right to withdraw consent to the accessing and processing of personal data at any time, provided that any lawful act carried out with the data provided remains valid.
- Right to request access to or copies of your personal information by signing into your Account or contacting us.
- Right to be informed of the retention period of all provided data.
- Right to request that TWD erase your personal information. You have the right to ask us to erase your personal information. Please note that this is a limited right which applies where the data is no longer required, or the processing has no legal justification. The exceptions to this right are where the applicable law requires TWD to retain a historical archive or where we retain a core set of your personal information to ensure we do not inadvertently contact you in future where you object to your data being used for marketing purposes.

- Right to correct or rectify any personal information that you provide which may be incorrect, out of date or inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Right to object to the processing of your personal information for marketing purposes. You have a right to ask us not to contact you for marketing purposes by adjusting your notification preference on the settings page or by opting out via the unsubscribe link in marketing emails we send you.
- Right to object to processing: You have the right to object to the processing of your Personal Information in certain circumstances. Please note that where you object to us processing your Personal Information, we might be unable to provide the services to you.
- Right to lodge a complaint against TWD with the Nigerian Data Protection Commission at info@ndpc.gov.ng.

The basis for processing your personal information is your consent. You also have the choice at any time to withdraw consent, which you have provided.

You also have the choice to deactivate your account at any time. You may contact us should you wish to deactivate your account at any time or exercise your rights as seen above by sending us an email at privacy@transactworlddigital.com.

Where we are unsure of your identity, we might ask you for proof of your identity for security reasons before dealing with your request.

Children Under the Age of 18

Our website is not intended for children under 18 years of age. No one under age 18 may provide any information to the website. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this website or through any of its features, register on the website, make any purchases through the website, use any of the interactive or public comment features of this website, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information.

If you believe we might have any information from or about a child under 18, please contact us at privacy@transactworlddigital.com.

International Data Transfers

Where Personal Information is to be transferred to a country outside Nigeria, TWD shall endeavour to put adequate measures in place to ensure the security of such personal information and to ensure same is done securely and in accordance with the Nigeria Data Protection Act 2023 and all applicable data protection regulations in force in the Federal Republic of Nigeria

Training Programs and Initiatives

TWD makes it a point of duty to ensure that its employees whose job description involve the collection, accessing and processing of personal information receive adequate data privacy and protection training in order to develop the necessary knowledge, skills and competence required to effectively manage the compliance framework under this policy document and the Nigeria Data Protection Regulation Act, 2023(NDPA) regarding the protection of personal information. On an annual basis, TWD shall continually develop capacity building plans for its employees on data privacy and protection in line with the NDPA and all other applicable regulations on the above subject matter.

Data Protection Officer

TWD has appointed a Data Protection Officer (DPO) responsible for overseeing the Company's data protection strategy and its implementation to ensure compliance with the NDPA requirements. The DPO is knowledgeable about data privacy and protection principles and is familiar with the provisions of the NDPA and all other regulations on the above subject matter.

Data Protection Audit

1. TWD shall conduct an annual data protection audit through a licensed Data Protection Compliance Organisation (DPCOs) to verify its compliance with the provisions of the NDPA and other applicable data protection laws.
2. The audit report will be certified and filed by the DPCO to the National Data Protection Commission (The "Commission"), as required under the NDPA.

Dispute Resolutions and Filing a Compliant

If you have any complaints regarding this privacy policy document, please contact us at privacy@transactworlddigital.com. We will investigate and work on resolutions for complaints and disputes regarding the use and disclosure of personal information within thirty (30) days in accordance with this privacy policy document and in accordance with the NDPA.

Updates to our privacy policy

From time to time, we may change, amend or review this privacy policy document from time to time to reflect new services or changes in our privacy policy and place any updates to the same.

All changes made will be posted on our website, and where changes will materially affect you, we will notify you of this change by placing a notice online or via mail. If you keep using our services, you consent to all amendments of this privacy policy.

Contact Information

To ask questions or comment about this privacy policy document and our privacy practices, contact us at: privacy@transactworlddigital.com.

This privacy policy document was last updated in March 2025..