

Last Updated: 17 July, 2024

Privacy Policy

This Privacy Policy ("Privacy Policy" or the "Policy") describes how The DD Affiance Project Limited ("We," "Us," or "Our") collect, store, use, and/or share your private information when you access the Lohli Application including any other media form, media channel, website, web or mobile application related, linked, or otherwise connected to Lohli (the "Application") including but not limited to when you:

- a) visit, access, register on, or otherwise use our website at www.lohli.com or where you visit any other website connected or associated thereto;
- b) download, register on, access or otherwise use our Lohli Application or any other application that leads or redirects to this Privacy Policy;
- c) contact, engage or relate with us for such purposes including but not limited to sales, marketing, enquiries, events, sponsorships etc.

1. Agreement

Please ensure that you read this Policy carefully. By registering on the Application, you warrant that you have read the Policy and you agree to be legally bound by the terms and provisions contained therein including any amendment or alterations thereto. Where you do not accept any of the provisions contained thereto, you are strongly advised to not register and use the Application or immediately stop using the Application as the case may be. Essentially, by using and registering on the Application, you agree to our use and processing of your personal information.

2. The Personal Information We Collect

Where you register on the Application or you access the Application for whatever reason, we shall collect certain personal information from you. The personal information we shall collect may include any or all of the following:

- a) Personal information you voluntarily provide to us including your full name, email address, phone number, gender, Bank Verification Number (BVN), National Identification Number (NIN);
- b) Payment information including bank details;
- c) Transaction information including in-Application PIN and other details of your transactions with Us;
- d) Your location information including your current location as disclosed by GPS technology or other technology that is capable of disclosing locations;
- e) Device information including device serial number or other useful information about your device;

- f) Log information including your device's IP address, identification numbers linked to your device, your device event information including such crashes, hardware settings and system activity, date and time stamps of transactions, system configuration information and your other interactions with the Application; and
- g) Information collected through cookies and related technologies. We may use cookies to personalise the advertisements you see or generally customise our service to you. We may use such cookies which include session cookies, persistent cookies and third-party cookies.

3. **How we process information**

We process information to ensure we provide you with optimal services and ensure you have a seamless use of the Application. We also process information received from you to prevent fraud, ensure security of the Application and your information. We also process your information to interact, communicate and send you updates about Us and the Application, and to comply with requisite laws and regulation.

Depending on how you use the Application, we may process your information in ways which include any or all of the following:

- a) To facilitate the creation of accounts on the Application and to ensure your account is working safely and without glitch at all times;
- b) To deliver, facilitate and customise the advertisements you see and generally, our services to you;
- c) We may make the information available for archiving, scientific research, historical research or statistical purposes for public interest;
- d) To respond to your complaints, inquires and to offer the best support to you;
- e) To send you Our marketing and promotional materials and also to determine the efficacy of Our marketing materials. We may process your personal information to better understand the promotional materials that suit your preference. You may opt-out from receiving Our marketing and promotional materials at any time;
- f) To protect the Application and generally our service to you as part of our active and unending efforts to keep the Application and your information safe and also to ensure fraud and anti-money laundering monitoring and prevention;
- g) We may process your information to identify usage trends and to determine how the Application is being used and the best ways to improve on the Application including the quality of advertisements and generally, Our services to you;
- h) To prevent you or any other user's vital interest and to ensure prevention of harm.
- i) We may process your private information to prevent crime and immoral or nefarious activities.

4. **Information Received from Third Parties**

Subject to applicable laws and regulation, we may receive information about you from third party sources which may include information from public databases, social media platforms, marketing partners and other outside sources. We may include this to the personal information you provide us via the Application. Specifically, information We collect from third party sources may include addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), Internet Protocol (IP) addresses, social media profiles, social media URLs, and custom profiles. Information we collect from third party sources may only be processed by Us for advertising and promotion. For instance, where you connect with Us on a social media platform using your social media account, We may receive personal information about you.

5. **Your Privacy Rights**

In relation to our use and processing of your information, you have the right to the following:

- a) **Right of Access** - You have the right to receive information about your personal information being processed by Us. Subject to legal limitations, you may receive a copy of your personal information we process. All you need do is submit a request and we shall respond accordingly. However, We shall require sufficient proof of your identity before we accede to your request. Where you do not provide sufficient proof of your identity, We may decline your request.
- b) **Right to withdraw consent** - You understand that by registering on the Application, you automatically consent to this Policy. However, you have the right to withdraw your consent to the processing of your personal information at any time. To withdraw your consent at any time, you may contact us via our contact information as expressed at the end of this Policy.
- c) **Right to rectification of personal information**- you have a right to request that we alter or rectify any error in the personal information you provide us.
- d) **Right to request the deletion of your personal information** - You may request that We delete your personal information where you have withdrawn the consent you gave us to process your personal information. Once we receive your request for deletion, we shall delete your personal information from our systems, records and database except if we have any overriding legal or legitimate ground to still keep your personal information in our database. Where we have a legal ground to still keep your personal information, this shall be communicated to you upon receipt of your request for deletion.
- e) **Right to Object** - You have the right to object to the way we process your personal information especially where you are of the belief that it affects your fundamental rights. However, there might be instances where we have overriding legal grounds to process your personal information regardless of your objection, in these instances, we may continue to process your personal information.
- f) **Right to Opt Out**- You have the right to opt-out from receiving marketing, promotional emails and offers from Us by clicking on the ***“unsubscribe”*** button on any of our communications or you may also contact us via our contact information as expressed at the end of this Policy.

- g) **Right to object to automated decision making which impacts you legally or affects you in other ways** - your right to object to automated decisions that have consequences on you subject to applicable data privacy laws.
- h) **Right to lodge a complaint with Nigeria Data Protection Commission** - Where you are unsatisfied with how we process your private information under this Policy, kindly contact us and we shall address all your complaints in accordance with applicable laws and this Policy. However, you have a right to lodge a complaint with the Nigeria Data Protection Commission.

6. **How We Share Personal Information**

By registering on the Application, you warrant and accept that we may share your private information without notice to you in the way and manner below:

- a) We may share personal information where you direct or authorise the sharing or transfer of same;
- b) We may share personal information with affiliated companies, service providers, our partners, developers, and publishers who act on Our behalf or are affiliated with Us;
- c) **We may share personal information you provide to us with third parties for research, educational, advertisement and promotional purposes but within the ambit of data protection laws and regulation. You hereby consent to this specifically;**
- d) Where the need arises, We may share personal information with banks associated with your account in connection with transactions carried out on the Application;
- e) Where you register on the Application, via a referral link, We may share your full name and your username with the user that referred you to confirm your registration on the Application;
- f) We may share your personal information with third parties for the performance or in furtherance of any contract we execute with them or you;
- g) **International Transfer-** we may transfer your personal information to any of our affiliated companies, agents, service providers or contractors who are not domiciled in Nigeria. We shall ensure that these companies or individuals are bound by the terms of this Policy and reasonably comply with the data privacy laws and regulations applicable in Nigeria. You hereby consent to international transfer of your private information.
- h) We may transfer your private information together with our database if We sell our company or any part of Our business or in the event of the liquidation of Our company. Your personal information may also be shared or disclosed during the process of any merger, sale of any of our assets or the acquisition of our Company. In any case, We shall exert reasonable efforts to the extent permitted by law, to ensure that your personal information is subject to this Policy and processed in line with same;
- i) We may share your private information where We are required to do so by applicable law or regulation or by a court of competent jurisdiction. We may also share your personal

information where we receive a lawful request or invitation from a governmental agency, quasi-judicial body or by a competent panel.

- j) We may share your personal information to protect or enforce Our rights, property, ensure safety of Our management or members of staff or other registered users of the Application; and
- k) We may share your personal information for the safety and security of the Application.

7. **Data Retention**

We shall retain your information for such period as it is necessary to fulfil the objects and purpose of this Policy. For the avoidance of doubt, We shall retain your personal formation for as long as your account is active or as it is necessary to provide you with services you have requested or authorized, including maintaining and improving the performance of the Application while also ensuring system security.

We shall also retain personal data as needed to maintain appropriate business and financial records, protect our legal interests, resolve disputes, or comply with legal or regulatory requirements.

8. **Privacy of Children**

Children are ineligible to register on or use the Application. Therefore, we do not knowingly collect nor process the information of Children. Where you are under 18 years of age, do not register on or use the Application for any reason whatsoever.

9. **Link to Third Party Sites**

The Application may contain links redirecting to third party websites, products or services. Any information that you provide on or to a third-party website, product or application or that is collected by a third party is provided directly to the third party, their website, product or service and is subject to their privacy policy which we are not privy to. We state emphatically that we shall not be responsible for the content, privacy policy or security measures adopted by the third party. In order to ensure that your personal information is adequately protected, we advise that you carefully review the privacy policies of all third party websites, products or services you access through the Application.

10. **Data Security and Protection of Your Personal Information**

We shall exert all reasonable administrative efforts and deploy all technologies available at our disposal to ensure that your data and personal information is secure with Us at all times. However, no method of storage or security of data and information is absolutely safe and secure. Based on this, we do not warrant, represent or guarantee that your personal information shall be absolutely secure in our database. We advise and implore you to play your own part in protecting your personal information especially your bank details and in-

Application transaction details. You have the obligation to immediately notify us of any unauthorised access to your account or any other breach of security that comes to your notice.

11. **Changes or Amendments to this Policy**

Subject to the provisions of relevant laws and regulation, we have the sole right to change, alter or amend this Policy as we deem fit at any time. Upon revision of this Policy, the revised or amended Policy shall be published on this page or any part of the Application, and the date on top of this Privacy Policy shall be duly updated. The revised Policy shall become effective upon it being published and shall become binding on you. You are advised to keep yourself abreast of any update to this Policy as we do not warrant or represent that we shall notify you of any update to the Policy. Where you do not accept any amendment to this Policy, We advise you to immediately request the deactivation of your account by contacting us. Except we provide or communicate otherwise, your use of the Application shall be subject to the version of this Policy that is in effect every time you access or make use of the Application.

12. **Our Contact Information**

If you have any questions or concerns concerning this Policy or how we process your private information, please contact us at support@lohli.com, or visit our office at 11B Reverend Ogunbiyi Street, Ikeja GRA, Lagos.