



**VERXID**

**PRIVACY POLICY (WEBSITE)**

## **1. CONSENT**

You accept this Privacy Policy when you sign up for, access, or use our products and services offered on our website, all related sites, and applications. Please review our Privacy Policy. By using this Website, you agree to be bound by our Privacy Policy. This Privacy Policy carries details on how we collect and use personal information gathered in the course of operating this service.

### **1.1 WITHDRAWAL OF CONSENT**

You can also let us know if you feel that your personal information is being processed in any way other than how you have consented to it being used. We will take reasonable steps to ensure that your personal information is processed in the manner in which you have consented to it, or we may delete it based on your instruction. However, we may not accede to your request if it is unrealistic, impractical, or inimical to our compliance with applicable regulations or laws.

## **2. WHAT INFORMATION DO WE COLLECT?**

We collect personal information that you voluntarily provide to us when you register on our Website, express an interest in obtaining information about us or our products and services when you participate in activities on the Website, or otherwise when you contact us. The personal information we collect may include the following:

- i. **Personal Information Provided by You:** We may also collect the information you directly provide to us including but not limited to information on web forms, account update information, and correspondence with our support service. We also collect information about your transactions and your activities. In addition, we collect your contact information such as; name, address, phone number, email, etc. Information obtained through survey responses, telephone conversations, user inquiries, and other means may also be collected and used by us. All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

- ii. Information automatically collected: Some information such as your Internet Protocol (IP) address and/or browser and device characteristics is collected automatically when you use our Website. We automatically collect certain information when you visit, use or navigate the Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about who and when you use our Website and other technical information. This information is primarily needed to maintain the security and operation of our Website, and for our internal analytics and reporting purposes.
- iii. We also collect information through cookies and similar technologies: The information we collect includes; Log and Usage Data. Log and usage data are service-related, diagnostic usage and performance information our servers automatically collect when you access or use our Website and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings, and information about your activity on the Website (such as the date/time stamps associated with your usage, pages, and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings).
- iv. Device Data: We collect device data such as information about your computer, phone, tablet, or another device you use to access the Website. Depending on the device used, this device data may include information such as your IP address (or proxy server), device application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, and operating system configuration information.
- v. Location Data: We collect information data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type of settings of the device you use to access the Website. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt-out of allowing us

to collect this information either by refusing access to the information or by disabling your Locations settings on your device. Note, however, that if you choose to opt out, you may not be able to use certain aspects of the Website.

- vi. We may also use the information provided by third parties like social media sites and verification agencies. Information about you which are provided by you or any person to other websites or platforms is not controlled by us, and we are therefore not liable for how they use it.

### **3. HOW DO WE USE YOUR INFORMATION?**

We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent. We use personal information collected via our Website for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below:

- i. We use the information we collect from you to verify your NIN: We use information obtained by you to verify your National Identity Number as obtained from the National Identity Management Commission (NIMC) database.
- ii. We use the information we collect or receive: To facilitate account creation and login process. If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and login process for the performance of the service.
- iii. Request feedback. We may use your information to request feedback and to contact you about your use of our services.
- iv. To manage user accounts: We may use your information to manage our account and keep it in working order.

- v. To send administrative information to you: We may use your personal information to send you new feature information and/or information about changes to our terms, conditions, and policies.
- vi. To protect our Website: We may use your information as part of our efforts to keep our Website safe and secure (for example, for fraud monitoring and prevention).
- vii. To enforce our terms, conditions, and policies for business purposes, to comply with legal and regulatory requirements, or in connection with our contract.
- viii. To respond to legal requests and prevent harm: If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- ix. To deliver and facilitate delivery of services to the user: We may use your information to provide you with the requested service.
- x. To respond to user inquiries/offer support to users: We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Website.
- xi. To send you marketing and promotional communications: We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Website, subscribing to marketing, or otherwise contacting us, we will collect personal information from you. You can opt out of our marketing emails at any time.
- xii. Deliver targeted advertising to you: We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.
- xiii. For other business purposes: We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve our Website, products, marketing, and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end-users and does not include personal information. We will not use identifiable personal information without your consent.

#### **4. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

We only share information with your consent, to comply with laws, to provide you with services, protect your rights, or fulfill business obligations. We may process or share your data that we hold based on the following legal basis:

- i. **Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- ii. **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- iii. **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- iv. **Legal Obligations:** We may disclose your information where we are legally required to do so to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal processes, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- v. **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situation:

- vi. **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

## **5. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?**

We are not responsible for the safety of any information that you share with third-party providers who advertise but are not affiliated with, our Website.

The Website may contain advertisements from third parties that are not affiliated with us and which may link to other websites, online Websites, or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this privacy notice. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, or applications that may be linked to or from the Website. You should review the policies of such third parties and contact them directly to respond to your questions.

## **6. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

Cookies are small files placed on your computer's hard drive that enables the platform or website to identify your computer as you view different pages. Cookies allow websites and applications to store your preferences to present content, options, or functions that are specific to you. Like most interactive websites, and online platforms, we use cookies to enable the tracking of your activity for the duration of a session. We use only encrypted session cookies which are erased either after a predefined timeout period or once the user logs out of our Website/App and closes the browser. Session cookies do not collect information from the user's computer. They will typically store information in the form of a session identification that does not personally identify the user.

We do not have access or control over the cookies of our partners, affiliates, and service providers. We are therefore not responsible for their use of their cookies.

## **7. HOW LONG DO WE KEEP YOUR INFORMATION?**

We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy unless a longer retention period is required or permitted by law

(such as tax, accounting, or other legal requirements). No purpose in this notice will require us to keep your personal information for longer than the period in which users have an account with us. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **8. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?**

We aim to protect your personal information through a system of organizational and technical security measures. We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, the transmission of personal information to and from our Website is at your own risk. You should only access the Website within a secure environment.

In the event of an actual or suspected breach of your personal information, we will use our best effort to remedy the breach within thirty (30) days.

## **9. Data Confidentiality Rights**

Your information is regarded as confidential and will not be divulged to any third party except under legal and/or regulatory conditions. You have the right to request copies of all information we keep on you, provided that you give us reasonable notice of such a request in writing. While we are responsible for safeguarding the information entrusted to us, your role in fulfilling confidentiality duties includes but is not limited to adopting and enforcing

appropriate security measures such as non-sharing of passwords and other platform login or transaction authentication details. You are ultimately responsible for the security of your platform login and transaction authentication details.

#### **10. DO WE MAKE UPDATES TO THIS POLICY?**

Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

#### **11. LIMITATION OF LIABILITY**

We will not be liable for loss of income, profits, business, opportunity, goodwill, contracts, or any indirect, special, incidental, or consequential damages arising out of or in connection with the Service, any computation or failed transaction on our Website, arising out of any breach of this Policy.

- i. We will not be liable for any loss or damage arising as a result of unauthorized access to the Service if (a) you intentionally or negligently fail to take reasonable precautions to protect your security, access codes, log-in details, or any device used to access the Service, (b) you failed to promptly notify us that the Service was being accessed in an unauthorized way after becoming aware of it, or (c) you acted fraudulently.
- ii. Our liability to you or any third party in any circumstance of proven liability by us, shall not exceed the fees paid to us in respect of the specific transaction that gave rise to the claim or liability unless otherwise specified by a court of competent jurisdiction.

## 12. NOTICE

To the fullest extent permitted by applicable law, this privacy policy and any other policy, notices, or other documents regarding your account and/or your use of the Service, may be provided to you electronically and you agree to receive all Notices from us in electronic form.

All Notices in either electronic or paper format will be considered to be in "writing and to have been received and shall become effective.

### **Notice Procedure**

- You can send notices to us shall by email to [support@verxid.com](mailto:support@verxid.com) or our phone number: 07036889036.
- You can also contact us at No 4 Macenta Close, Wuse 2, Abuja.
- Notices by us to you may be placed on our website or sent to your email address registered with us.
- A notice by email shall be deemed received by the other party, once the email is sent.
- Notice posted to our website shall be deemed received upon your visit to our site or your first log-in after the posting.