

# PRIVACY POLICY: MEELOW FOR JAGOO TECH LIMITED

## Introduction

Welcome to **Jagoo Tech Ltd** (Meelow) privacy policy.

This Privacy Policy demonstrates the commitment of Jagoo Tech Ltd (Meelow) to protecting your personal data and sets forth Jagoo Tech Ltd (Meelow) information collection and management practices.

Meelow is “a technology mobile application and website (“**Services**”) for bill payments and related account and security services, including a live-location security feature.

Jagoo Tech Ltd (Meelow) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you on how we collect and manage your personal data when you visit our mobile application and website and your privacy rights as well as how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here:

**[INSERT LINK]**

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

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## 1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Jagoo Tech Ltd (Meelow) collects and processes your personal data through your use of Meelow, including any data you may provide through Meelow when you sign up to our newsletter, purchase a product or service, provide feedback or in any other manner interact with us.

Please read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them. The Services are not intended for children, and we do not knowingly collect personal data from children.

## **Controller**

Jagoo Tech Ltd (Meelow) is the controller and responsible for your personal data (collectively referred to as "Meelow" "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

### Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: **JAGOO TECH LTD**

Email address: [jagootech@gmail.com](mailto:jagootech@gmail.com)

Postal address: **Pengassan Estate, Phase 2, Lokogoma, FCT, Abuja**

You have the right to make a complaint at any time to the National Information Technology Development Agency (NITDA), the Nigerian regulator for data protection issues ([www.nitda.gov.ng](http://www.nitda.gov.ng)). We would, however, appreciate the chance to deal with your concerns before you approach the NITDA so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes.

We may update this privacy policy at any time. When we do, we will revise the updated date at the bottom of this page. We encourage you to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications. You may obtain historic versions by contacting us.

### **Third-party links**

This website may contain links to third-party websites, plug-ins, applications and services. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. A link to any third-party websites does not mean that we endorse it or the quality or accuracy of information presented on it.

If you decide to visit these third-party websites, you are subject to their terms and conditions, and not these terms. We encourage you to carefully review the legal and privacy notices of all other digital services that you visit.

## **2. The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, company name, RC number, username or similar identifier, marital status, title, date of birth and gender.
- Financial Data includes bank account and payment card details.

- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Transaction Data includes details about payments to and from you and other details of bundles, and other services you have purchased from us.
- Usage Data includes information about how you use our website, products and services.
- Contact Data includes email address, phone number, billing address.
- Device Data includes device identifiers, mobile OS, device model, app version and mobile network information.
- Location Data includes your live/real-time location and/or approximate location when you enable location permissions and the security feature is on (including background location if you allow it).
- Verification/KYC Data (if applicable) includes government ID, selfie/liveness checks, BVN/NIN or similar identifiers, and verification results.
- Payee/Bill Data includes biller name, customer/reference number, bill amount, service address (if provided), and bill payment history.
- Security and Fraud Data includes login timestamps, failed login attempts, device fingerprinting, risk signals, and location-based risk indicators.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not intentionally collect special categories of personal data. However, precise location data may be considered sensitive personal data under some laws; we process it only with your explicit consent/permission through your device settings and for the purposes described in this policy (primarily security and fraud prevention).

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### **3. How is your personal data collected?**

We use different methods to collect data from and about you including through:

- i. **Direct interactions:** You may give us your Identity, Contact, Social Media Login details and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey;
  - give us feedback or contact us; or
  - payment initiation and bill payment details you submit.
  
- ii. **Automated technologies or interactions:** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect data through app permissions (for example, location), mobile SDKs, and similar technologies used in apps. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [INSERT LINK] for further details.
  
- iii. **Third parties or publicly available sources:** We will receive personal data about you from various third parties and public sources as set out below.
  - a. Technical Data from the following parties:
    - analytics providers;
    - advertising networks; and
    - search information providers.
  
  - b. Contact, Financial and Transaction Data from providers of technical, personal data from social media platforms payment and delivery services.
  
  - c. Identity and Contact Data from data brokers or aggregators.
  
  - d. Identity and Contact Data from publicly available sources.
  
  - e. Payment processors, banks, billers/aggregators, identity verification providers, fraud prevention and device intelligence providers.

#### **4. How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- i. Where we need to perform the contract we are about to enter into or have entered into with you.
- ii. Where it is necessary for our legitimate interests or those of a third party and your interests and fundamental rights do not override those interests.

iii. Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out below.

- Register and manage your account (Identity, Contact, Profile; contract/legitimate interests)
- Provide bill payment services and process transactions (Identity, Contact, Financial, Transaction, Payee/Bill; contract/legal obligation)
- Verify identity and comply with AML/CFT/KYC requirements (Identity, Verification/KYC; legal obligation)
- Prevent fraud and secure accounts, including location-based security checks (Technical, Device, Security/Fraud, **Location**; legitimate interests/legal obligation; consent where required)
- Provide customer support and dispute resolution (Identity, Contact, Transaction, Communications; contract/legitimate interests)
- Send service messages (changes, outages, receipts) (Contact, Transaction; contract/legal obligation)
- Marketing (only if opted-in where required) (Marketing/Comms; consent/legitimate interests)
- Analytics and improvements (Technical, Usage; legitimate interests)

### **Location Use**

If you enable the live location security feature, we will collect and use your location to:

- (i) detect and prevent fraudulent access or transactions
- (ii) verify that high-risk sign-ins are legitimate
- (iii) support account recovery and incident response, and
- (iv) comply with legal obligations.

You can disable location permissions at any time, but some security features may not function.

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

We may use in-app notifications and push notifications for service-related messages and, where permitted, marketing. You can manage push notifications in your device settings.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see [INSERT COOKIE POLICY LINK].

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.

- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets.

Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We may share information (including location-based risk signals) with fraud prevention partners where necessary to protect you, us, and the integrity of the Services.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

We may share your personal data with our affiliate companies or external third parties. This may involve transferring your data outside Nigeria. We ensure your personal data is protected by requiring all our affiliate companies to follow the same rules when processing your personal data.

Whenever we transfer your personal data out of Nigeria, we ensure a similar degree of protection is afforded to it. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of Nigeria.

This may include transfers to cloud providers and payment/security vendors outside Nigeria. We use appropriate safeguards (for example, contractual protections) where required.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We use encryption in transit and at rest where appropriate, multi-factor authentication options, and monitoring for suspicious activity.

## **8. Data retention**

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data.

In some circumstances we will anonymise your personal data so that it can no longer be associated with you for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Transaction and payment records may be retained for the period required by applicable financial services, tax, AML/CFT and audit laws.

Location data is retained only as long as necessary for security investigations and risk analysis, unless longer retention is required by law.

## **9. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data and if you wish to exercise any of the rights, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or to exercise any of your other rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Glossary

### LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

### THIRD PARTIES

#### 1. Internal Third Parties

- Biller/Bill Aggregator
- Location Data
- Device Data
- Verification/KYC Data

#### 2. External Third Parties

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based who provide consultancy, banking, legal, insurance and accounting services.
- Financial and Tax Authorities, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Fraud Prevention Authorities, regulators and other authorities who require reporting of processing activities in certain circumstances.
- Payment processors, banks, billers and bill aggregators.
- Fraud prevention, device intelligence and security monitoring vendors
- Identity verification/KYC vendors.
- Cloud hosting and analytics providers.

### YOUR LEGAL RIGHTS

You have the right to:

- i. request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- ii. request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- iii. request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- iv. object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- v. request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- vi. request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- vii. withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.