



Privacy Policy

Version	Date of Approval	Person Responsible
1.0		Compliance Officer

This document (“**Privacy Policy**”) describes how Chargebride Innovation Limited, company registration number 8130907, with its registered address at Plot 2241, Festac Link Bridge, Amuwo Odofin, Lagos State, Nigeria (hereinafter “**Naijasend**”, “**we**”, “**us**”, or “**our**”) processes personal data. Naijasend understands that your privacy is important to you and that you care about how your personal data is used and shared online. This Privacy Policy applies to personal data processing that occurs when you visit our website, and use our services (“**Services**”) or interact with us with respect to our Services.

Please read this Privacy Policy carefully and ensure that you understand it. If you have any questions regarding this Privacy Policy, feel free to contact us via the contact information stated in section 9 below.

1. Definitions and interpretation

1.1 In this Privacy Policy, the following terms shall have the following meaning:

“Account” – means an account required to access and use our Services;

“Cookie” – means a small text file placed on your computer or device when you visit certain parts of the Website and/or when you use certain features of the Website. You may read more about the Cookies we use in section 7 below;

1.2. Terms such as “personal data”, “processing”, “transfers” and other terms used in this Privacy Policy shall be construed in accordance with applicable data protection laws, such as the Nigeria’s Data Protection Regulation (NDPR) 2019, and all other national or supranational legislation which may be applicable (together, the “**Applicable Data Protection Laws**”).

2. Data Collected

2.1.1 We will process the following categories of personal data:

1. **General and contact information**, such as name, date of birth, e-mail address, telephone number, address and postal code;
2. **Financial information**, such as payment method information;
3. **Any other information that you may share with us in a free text when you communicate with us**. Please bear in mind not to share more personal data than what is necessary for the enquiry you have.
4. **System information**, such as IP address, web browser type and version, operating system, information on your Website activity, the URLs you visit from and URLs you go to once you have left our Website;

2.1.2 Please bear in mind that we are unable to provide you with the Services unless we can process the personal data listed above. The processing of the personal data listed above is necessary to enter into an agreement with us and is necessary to maintain the contractual relationship between you and Naijasend.

2.2 When you browse our Website

2.2.1 When you browse our Website without creating an Account, we will process the following categories of personal data:

3. Purposes of processing and legal grounds

3.1 When you have an Account, we will process personal data listed above for the following purposes and on the basis of the following legal grounds:

- Providing the Services to you and managing your Account. The legal ground for this processing is contractual performance;
- For the fulfilment of legal obligations that Naijasend may be subject to, such as the anti-money laundering and book-keeping legislation. The legal grounds for this processing are Naijasend’s legal obligations;

- For the enforcement of the agreement you have with us, including to protect our rights, property and safety and also the rights, property and safety of third parties if necessary. The legal ground for this is our legitimate interest to establish, exercise or defend legal claims;
- Personalising and tailoring your experience on the Services, including gathering and anonymising data on user traffic, usage patterns, user numbers, sales and other information. The legal ground for this processing is your consent. You may withdraw your consent at any time by updating your preferences in your account settings or contacting us.
- Replying to your enquiries and customer service requests. The legal ground for this processing is our legitimate interest to address any questions, requests or other forms of enquiries you may have;
- Sending you e-mails that you have opted into. The legal ground for this processing is your consent. You may withdraw your consent at any time through clicking on the “unsubscribe” link at the end of each e-mail).

4. How long do we store personal data for?

4.1 We do not keep your personal data for any longer than is necessary for achieving the purpose(s) for which the personal data was first collected.

4.2 Naijasend retains your personal data for the duration of providing the Services to you until you have request the deletion of your Account. Please note that once you have requested deletion, your personal data will be retained with limited access within the organization in accordance with applicable laws and regulations.

5. Where and with whom do we process personal data?

5.1 We may share your personal data with our affiliates and service providers in order to be able to provide our Services. These service providers may include services of payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your personal data. Where any of your personal data is required for such a purpose, we undertake steps to ensure that your personal data is processed in accordance with the requirements of the Applicable Data Protection Laws.

5.3 In certain circumstances, we may be legally required to share certain personal data we process. For example, where we are involved in legal proceedings, where we are complying with legal obligations, a court order, upon a legitimate request from a governmental authority, or to prevent and investigate fraud, or other illegal activity. This data is shared to protect ourselves, you and other customers, including where necessary for the purposes of an investigation.

5.4 We may compile statistics about the use of the Website including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymized and will not include any personal data, or any anonymized data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers.

5.5 Please bear in mind that our Website may contain references to other websites. You may also be directed to other websites that are outside of Naijasend’s control. Hence, we recommend that you read the other websites’ privacy policies to understand the personal data processing that they conduct.

6 Security

6.1 Data security is very important to us. Naijasend continuously undertakes appropriate technical and organisational measures to ensure adequate security of your personal data throughout the processing.

6.2 For example, we have undertaken the following steps to secure and protect your personal data:

- We have implemented & maintain a rigorous internal data protection policy; and
- We have server-sided security measures & firewalls.

7. Cookies

7.1 Cookie types

7.1.1 The Website places certain first party Cookies on your computer or device, as specified in section 7.3 below. First party Cookies are those placed directly by Naijasend and are used only by us. We use Cookies to facilitate and improve your experience of the Website and to provide and improve the Services. We have carefully chosen these Cookies and have taken steps to ensure that your personal data is protected and respected at all times.

7.1.2 Certain features of the Website depend on Cookies to function. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser's settings as detailed below in section 7.2, but please be aware that the Website may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

7.1.3 Some Cookies are designed to enable the Website to save information on your preferences in order to provide a better experience, such as to remember your username or which language you prefer to browse in. These Cookies are commonly called functionality cookies.

7.1.4 By browsing and using the Website, certain third party Cookies will be placed on your computer or device. This type of Cookies are cookies created by third parties that are placed on your computer or device via our Website. We do this for analytics – to measure and follow up on the use of our Website, as described below in 7.1.5. These Cookies are not strictly necessary for the functioning of the Website and your use and experience of the Website will not be impaired if you refuse to consent to them.

7.1.5 There are Cookies that analyse the performance of the Website and detect errors enable us to recognize whether you have visited the Website before, what pages on the Website are most visited, how much time visitors spend on our Website etc. They are commonly called performance cookies and their purpose is to improve and analyse the performance of the Website and your experience. The Website uses analytics services provided by Google LLC. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how the Website is used. This, in turn, enables us to improve the Website and the products and services offered through it. You do not have to allow us to use these Cookies.

7.2 Your consent

7.2.1 Before Cookies are placed on your computer or device, you will be shown a prompt requesting your consent to set those Cookies. The personal data processing that is conducted via Cookies is thus based on your consent as a legal ground for processing. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You have a choice to deny consent to the placement of Cookies; however certain features of the Website may not function fully or as intended. Furthermore, you can change your cookie preferences or withdraw your consent at any time by accessing the cookie settings available on our website.

7.2.2 In addition to the controls that we provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

7.2.3 You can choose to delete Cookies on your computer or device at any time, however you may lose some information that enables you to access the Website more quickly and efficiently, such as login and personalization settings.

7.2.4 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

7.3 The Cookies set by our Website

7.3.1 The following first party Cookies will be placed on your computer or device:

Origin	Description	Cookie Name	Lifespan
Naijasend	A single session cookie used to remember settings during your website visit (e.g. for filling in forms)	ASP.NET_SessionID	Till end of visit (session)
	Your preference for cookie placement.	cc_cookie_accept	1 year
		cc_cookie_decline	1 year
Google Analytics	Cookies used by Google Analytics for collecting anonymous visitor statistics used to enhance the website and usability	_utma	2 years
		_utmb	Till end of visit (session)
		_utmc	30 minutes
		_utmz	12 hours

7.3.2 The following third party Cookies will be placed on your computer or device:

Origin	Description	Cookie Name	Lifespan
Google Analytics	Collects information that is used in aggregate form to help us understand how our website is being used, how effective marketing campaigns are, and to help us customise our website for you.	_ga	2 years

8. Your rights

8.1 As a data subject, you have the following rights under the Applicable Data Protection Laws:

The right to request access to and information about the personal data that we process about you, including the purposes of processing, the recipients of the data, and the retention period.

The right to request correction (rectification), completion, erasure, or restriction of the processing of your personal data.

The right to obtain a free copy of the personal data we process about you.

8.2 Where we process your personal data on the basis of consent or to fulfill a contract, you have the right to data portability, which means you can receive your personal data in a commonly used, structured, and machine-readable format and transfer it to another controller.

8.3 You have the right to withdraw your consent at any time where processing is based on consent, and this will not affect the lawfulness of processing carried out before your withdrawal.

8.4 You have an absolute right to object to personal data processing done for the purposes of direct marketing, such as your choice to receive e-mails from us.

8.6 If you have any cause for complaint about our processing of your personal data, please contact us using the details provided in section 9, and we will do our best to address your concerns within one month of receiving your request.

9. Contact Us

9.1 If you want to exercise your rights as per section 8 above, or if you have any questions about Naijasend's processing of personal data regarding you or if you have questions about this Privacy Policy, please feel free to contact us via our website.

9.2 When you contact us, please state your full name and ensure that your query is clear, particularly in the event the query is with respect to the processing of personal data regarding you. Additionally, please note that we may have to verify your identity before we proceed with processing your request.

10. Change of control

10.1 We may, from time to time, expand or reduce our business, which may involve the sale and/or transfer of control of all or part of our business. In such cases, any personal data that you have provided and that is relevant to the part of the business being transferred may also be transferred. The new owner or controlling party will be bound by the terms of this Privacy Policy and will only be permitted to use your personal data for the same purposes for which it was originally collected by us.

10.2 In the event of a transfer of your personal data, we will inform you in advance of the transfer, including details of the new owner or controller, and the purposes of processing. You will have the right to object to the transfer or request that your personal data be deleted or withheld from the new owner or controller before the transfer takes place. If you do not object or request deletion, the transfer will proceed under the terms of this Privacy Policy.

11. Changes to this Privacy Policy

We may change this Privacy Policy from time to time. Any changes will be immediately posted on the Website. We recommend that you check this page regularly to keep up-to-date. If your consent is required due to a change of this Privacy Policy, we will provide you with relevant information and ask for such consent in accordance with Applicable Data Protection Laws.