

XTRAPAY Data Privacy Statement

Table of Content

1.0	
Introduction	3
2.0	
Definitions.....	3
3.0	
Statement Details.....	3
3.1Collection of Information.....	3
3.2 What Customer Information is Collected.....	4
3.3 Use of information.....	5
3.4 Retention of Information.....	5
3.5 Disclosure of Information	6
3.6 Use of Cookies.....	6
3.7 Use of Hyperlinks.....	6
3.8 Access to Information	7
3.9 Safeguarding and Protection of Information.....	7
3.10 Non-Compliance with this Statement	8
3.11 Amendments to this Privacy Statement.....	8
4.0	
Statement Effective Date.....	8

1.0

Introduction

XTRAPAY is committed to respecting and protecting your privacy in compliance with the applicable laws and obligations on data use and privacy. In order to demonstrate this commitment, XTRAPAY has provided this Statement to explain to you how it collects, uses and protects subscriber information. This Statement should be read together with the terms & conditions of use for other XTRAPAY products and services. Where there is a conflict, this Statement will prevail.

This Statement applies to all customers.

2.0

Definitions

References to

2.1 **“Customer”** or **“you”** means you the person who subscribes to, uses or purchases any of our services or accesses our websites and includes any person who accesses any of the services you have subscribed to.

2.2 **“XTRAPAY”**, **“we”** or **“us”**, **“our”** and **“ours”** means XTRAPAY.

2.3 The word **“includes”** means that what follows is not necessarily exhaustive and therefore the examples given are not the only things/situations included in the meaning or explanation of that text.

3.0

Statement Details

3.1

Collection of Information

3.1.1 XTRAPAY collects your personal information with your knowledge and consent when you:

- a) register for a specific product or service, including Agent registration, XTRAPAY subscriptions, e-commerce platforms;
- b) buy or use a XTRAPAY product or service online, on the cloud, on a mobile or other device, in a XTRAPAY Shop or other retail outlet;
- c) subscribe to XTRAPAY or third party USSD services, Short Message Service (SMS), email or social media platforms;
- d) ask XTRAPAY for more information about a product or service or contact XTRAPAY with a query or complaint;
- e) respond to or participate in a survey, marketing promotion, prize competition or special offer;
- f) visit, access or use XTRAPAY or third party websites.

XTRAPAY may also collect your information from other organisations including NIBBS other business directories.

3.1.2 If you allow a child to use our services, you should be aware that their personal information could be collected as described in this statement.

3.2

What Customer Information is collected?

The information we collect and store about you ("**Customer Information**") depends on the XTRAPAY and third party products and services you use and subscribe to. The Customer Information includes but is not limited to the following:

3.2.1 Your identity and SIM-card registration information, including your name, address, phone number, identity document type and number, date of birth, email address and mobile number portability records.

3.2.2 Your credit or debit-card information, information about your bank account numbers and SWIFT codes or other banking information.

3.2.3 Your preferences for particular products and services, based on information provided by you or from your use of XTRAPAY's (or third party) network, products and services.

3.2.4 Your contact with us, such as when you: call us or interact with us through social media, email (we may record your conversations, social media or other interactions with us), register your biometric information such as your voice, finger prints etc, visit a XTRAMART Shop or other retail outlet.

3.2.5 Your account information, such as your handset type/model, tariff, top-ups; subscriptions (including third party subscriptions), billing statements, cloud hosting registration details, e-commerce registration and usage, XTRAPAY and mobile money transactions.

3.2.6 Your call data records: phone numbers that you call or send messages to (or receive calls and messages from), log of calls, messages or data sessions on the XTRAPAY network and your approximate location (save for customer service interactions as noted above we do not record or store message or call contents).

3.3

Use of Information

We may use and analyse your Customer Information for the following purposes:

3.3.1 Processing goods and services that you have bought from XTRAPAY or from third parties on our ecommerce platforms;

3.3.2 Billing you for using our or third party products or services or taking the appropriate amount of credit from you;

3.3.3 Responding to any of your queries or concerns;

3.3.4 Verifying your identity information through publicly available and/or restricted government databases in order to comply with regulatory requirements;

3.3.5 Carrying out a credit check;

3.3.6 Keeping you informed generally about new products and services and contacting you with offers or promotions based on how you use our or third party products and services unless you opt out of receiving such marketing messages (you may contact XTRAPAY at any time to opt out of receiving marketing messages);

3.3.7 Using the XTRAPAY telephone directory enquiry service in printed or electronic format;

3.3.8 to comply with any legal, governmental or regulatory requirement or for use by our lawyers in connection with any legal proceedings;

3.3.9 In business practices including to quality control, training and ensuring effective systems operations;

3.3.10 To Protect our network including to manage the volume of calls, texts and other use of our network;

3.3.11 To Understand how you use our network, products and services for purposes of developing or improving products and services;

3.3.12 Preventing and detecting fraud or other crimes and for debt recovery;

3.3.13 For research, statistical and other scientific or business purposes;

3.3.14 Provide aggregated (which do not contain any information which may identify you as an individual) to third parties;

3.3.15 Administer any of our online platforms/websites.

3.4

Retention of Information

XTRAPAY will store your information for as long as required by law or regulations. If there is no statutory or regulatory requirement, XTRAPAY will only store Customer Information for as long as it is needed.

3.5

Disclosure of Information

3.5.1 Any disclosure of your information shall be in accordance with applicable law and regulations. XTRAPAY shall assess and review each application for information and may decline to grant such information to the requesting party.

3.5.2 we may disclose your information to:

a) law-enforcement agencies, regulatory authorities, courts or other public authorities in response to a demand issued with the appropriate lawful mandate and where the form and scope of the demand is compliant with the law.

b) subsidiaries, associates, partners or agents who are involved in delivering XTRAPAY products and services your order or use;

c) credit-reference agencies, fraud-prevention agencies, business-scoring agencies or other credit-scoring agencies;

d) Publicly available and/or restricted government databases to verify your identity information in order to comply with regulatory requirements;

e) debt-collection agencies or other debt-recovery organisations; or

f) Emergency service providers when you make an emergency call (or where such disclosure to emergency service providers is necessary for your rescue, health and safety) including your approximate location.

3.5.3 Some of your information may be passed on to any person whom you receive mobile money from, or send or intend to send mobile money to. Your information may be available to any third party involved in the operation of the mobile money service including XTRAPAY Merchants, mobile money interoperability partners, ATM Switch providers and vendors of the XTRAPAY money transfer technology platform.

3.5.4 We shall not release any information to any individual or entity that is acting beyond its legal mandate.

3.6

The Use of Cookies

3.6.1 We may store some information (using "cookies") on your computer when you visit our websites. This enables us to recognise you during subsequent visits. The type of information gathered is non-personal (such as: the IP address of your computer, the date and time of your visit, which pages you browsed and whether the pages have been delivered successfully).

3.6.2 We may also use this data in aggregate form to develop customised services - tailored to your individual interests and needs. Should you choose to do so, it is possible (depending on the browser you are using), to be prompted before accepting any cookies, or to prevent your browser from accepting any cookies at all. This will however cause certain features of the web site not to be accessible.

3.7

The Use of Hyperlinks

3.7.1 Our websites may provide hyperlinks to other locations or websites on the Internet. These hyperlinks lead to websites published or operated by third parties who are not affiliated with or in any way related to us and have been included in our website to enhance your user experience and are presented for information purposes only. We endeavour to direct you to reputable websites and sources of information for your convenience.

3.7.2 We do not endorse, recommend, approve or guarantee any third-party products and services by providing hyperlinks to an external website or webpage and do not have any co-operation with such third parties unless otherwise disclosed. We are not in any way responsible for the content of any externally linked website or webpage.

3.7.3 By clicking on a hyperlink, you will leave the XTRAPAY webpage and accordingly you shall be subject to the terms of use and privacy policies of the other website that you choose to visit.

3.8

Access to Information

To update your information go to <https://www.xtrapay.ng/wallet> and sign in to my wallet to look at your personal information. You can change how we get in touch with you and your account details whenever you like.

3.9

Safeguarding and Protection of Information

XTRAPAY has put in place processes, resources, controls, tools and other measures to protect your information from unauthorised access, accidental loss or destruction.

3.10 Non-Compliance with this Statement

XTRAPAY shall have the right to terminate any agreement with you for failure to comply with the provisions of this statement and reject any application for information contrary to this statement.

3.11 Amendments to this Statement

XTRAPAY reserves the right to amend or modify this statement at any time. If XTRAPAY amends this statement, it will post any changes on the XTRAPAY website so that you will always know how your personal information is being used or shared.

4.0

Statement Effective Date

1st September, 2020