

Privacy Policy

Under the Nigeria Data Protection Regulation 2019 (**Regulation**), we are required to provide you with certain information about who we are, how we process your personal data and for what purposes, and your rights in relation to your personal data. This information is provided in our privacy policy and it is important that you read that information to understand our practices regarding your personal data and how we will treat it.

Please indicate your consent to our processing of your personal data (including your name, contact details and financial information) as described in our privacy policy.

If you have any questions about this privacy notice, how we handle your personal data, or you would like to update the personal data we hold about you, please email compliance@chiliesfores.com.

Once you provide consent by selecting "YES", you may change your mind and withdraw consent at any time by contacting us but that will not affect the lawfulness of any processing carried out before you withdraw your consent. We are committed to protecting your personal data and respecting your privacy.

Introduction

This Privacy Policy (Policy) and any additional terms of use incorporated by reference into this Policy, together our Terms of Use) applies to your use of our site to purchase our products and services. Chilies Forés Farms Limited is the controller and is responsible for your personal data (collectively referred to as "we", "us" or "our" in this Policy). We have appointed a data protection officer (DPO). All those subject to this Policy will be referred to as "users" in this Policy.

Purpose of this Policy

This Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us and tells you about your privacy rights and how the law protects you.

Changes to this policy

We may change this Policy from time to time in order to reflect changes in the law and/or our privacy practices and if it does, these changes will be posted on this page and when you next visit our site, the new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the site.

Data collection

Under this Policy, personal data, or personal information, means any information about an individual from which that person can be identified.

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

- a) **Identity Data** includes your name, first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- b) **Contact Data** includes your contact address, email address and telephone numbers.
- c) **Financial Data** includes your bank account and payment card details.

- d) **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from and through us.
- e) **Technical Data** includes your 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.
- f) **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- g) **Usage Data** includes information about how you use our site, products and services.
- h) **Marketing and Communications Data** includes your preferences for receiving marketing from us and our third parties and your communication preferences.

How is your personal data collected?

We will collect your personal data from the following general sources:

- a) Information you give us: This is information including identity, contact and other personal data you consent to giving us about you by filling in forms on our site, or by corresponding with us either by email or chat. It includes information you provide when you register to sponsor a farm, or purchase any of our products and services. If you contact us, we will keep a record of that correspondence.
- b) Information we collect about you: Each time you visit our site we will automatically collect personal data. We collect this data using cookies and other similar technologies, please see our [\[LINK TO COOKIE NOTICE\]](#).
- c) Transaction information: We collect transaction information related to the purchase of our products and services, including the type of services requested or provided, order details, delivery information, date and time the service was provided, amount charged, distance travelled, and payment method. Additionally, if someone uses your promotion code, we may associate your name with that person.
- d) Device data: We may collect data about the devices used to access our site, including the hardware models, device IP address, operating systems and versions, software, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion data, and mobile network data.
- e) Information we receive from other sources including third parties and publicly available sources. We will receive personal data about you from various third parties and public sources such as:
 - i. User feedback, ratings, or compliments.
 - ii. Users participating in our referral programs. For example, when a user refers another person, we receive the referred person's personal data from that user.
 - iii. Users who request services for or on behalf of other users, or who enable such users to request or receive services through their accounts.
 - iv. Users or others providing information in connection with claims or disputes.
 - v. Publicly available sources (for example, telephone directory, social media, internet, news articles) and organisations to assist in prevention and detection of crime, police and law enforcement agencies.
 - vi. Marketing service providers.

Use of your personal data

We need all the personal data listed above primarily to allow us to comply with our legal obligations and process your personal data for a number of purposes, including:

- (a) profile, usage, and other data to prevent, detect, and combat fraud or unsafe activities.
- (b) Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems.
- (c) To conduct data analysis, testing, and research; and to monitor and analyse usage and activity trends.
- (d) Testing, research, analysis, product development, and machine learning to improve the user experience on our site.
- (e) To improve and enhance the safety and security of our site.
- (f) To improve our capacity to prevent the use of our site, products and services for illegal or improper purposes, develop new features and products, and facilitate insurance and finance solutions in connection with our services.
- (g) Legal proceedings and requirements. We may use the personal data we collect to investigate or address claims or disputes relating to use of our site, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.
- (h) Using user ratings and feedback to encourage compliance with our relevant rules and regulations and as grounds for deactivating driver partners with low ratings or who otherwise violated such guidelines.

Data sharing and disclosure

We may share your data with our affiliates, subsidiaries, and partners, for legal reasons or in connection with claims or disputes if we believe it is required by applicable law, regulation, operating license or agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns. This includes sharing your personal data with law enforcement officials, public health officials, other government authorities, or other third parties as necessary; to protect our rights or property or the rights, safety, or property of others; or in the event of a claim or dispute relating to the use of our services. If you use another person's credit card, we may be required by law to share your personal data with the owner of that credit card. This also includes sharing personal data with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

With consent: We may share a user's personal data other than as described in this Policy if we notify the user and they consent to the sharing.

Data Security

All information you provide to us is stored on our secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted using [NAME OF TECHNOLOGY] or alternative encryption technology. Where we have given you/or where you have chosen a password that enables you to access our app or certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Once we have received your information, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way.

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

Data retention and deletion

Under the **Cybercrimes (Prohibition, Prevention, etc.) Act 2015**, we are permitted to retain your personal data for a period of two years 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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

User legal rights

Under certain circumstances you have the following rights under the Regulation in relation to your personal data:

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.

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.

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 to continue 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 data 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.

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.

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:

- a) if you want us to establish the data's accuracy;
- b) where our use of the data is unlawful, but you do not want us to erase it;
- c) 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; or
- d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

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 we used the information to perform a contract with you.

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.

File a complaint with the National Information Technology Development Agency (NITDA) on how we have handled your personal data.

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.