

[February 11, 2025]

Hello! Welcome to Swifia Technology Ltd(Swifia)privacy policy.

Who we are and the purpose of the policy.

Swifia is a gift card company that facilitates the purchase and redeem gift cards from listed partners. Swifia ("We", "Our", "Us") respects your privacy and is committed to protecting your personal data when you access our service.

This privacy policy will inform you as to when, how we collect and handle your personal data when you register, purchase, or redeem gift cards, or our contact customer support and tell you about your privacy rights and how we comply with regulations to protect your data.

Please note that you accept this Privacy Policy when you sign up for, access, or use our products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services. This privacy policy supplements other notices and policies and is not intended to override them.

It is important that you read this privacy policy together with any other policy, we may provide modifications or changes to this policy to meet all present and future changes in regulations, and processes. Where modifications are made to our Privacy Policy, notifications will be made on this platform and in all our channels of service. We advise you to review the privacy policy at every visit to our website or connected apps.

IN THIS POLICY:

1. **"Data"** refers to any information in writing, audio-visual, or any information formats published on our

website or such automatically generated by our platform which belongs to our users and allows us to offer better services.

2. **“Data Controller”**- This refers to the party responsible for the collection of data for itself or further transfer to a Data Processor; In this agreement, Swifia acts as a data controller.

3. **“Data Processor”**- refers to the party responsible for overseeing the process of data processing of data, storage, and the implementation of strategies in line with the procedures provided by applicable data privacy and protection regulations and laws.

4. **“Data Protection Legislation”**: all applicable data protection and privacy legislation in force from time to time in Nigeria, including the Nigeria Data Protection Act 2023.

5. **“Parties”** refers to the Swifia and the user;

6. **“Personal Data”** refers to such information from which your identity could reasonably be ascertained. This information includes; name, age, address, gender, tribe, date of birth, nationality, Biometric verification number etc. These data will only be collected in accordance with this policy and other agreements with Swifia.

7. **“Service”** refers to such functions/activities carried out for and on behalf of our clients on our website, app and connected sites. The Swifia service is not intended for anyone below 18 years, and we do not knowingly collect data relating to children.

Data Controller

Swifia is the controller and responsible for your personal data (collectively referred to as Swifia, "we", "us" or "our" in this privacy policy). If you have any questions about this privacy policy and our data protection practices including any requests to exercise your legal rights, please contact us via the details set out below.

The Type Of Personal Data We Collect

Personal data is as defined in this policy and it does not include data where the identity has been removed (anonymous data/pseudonymized). In order to enable us create a profile for you and operate an account or to generally provide you with our products and services and comply with all relevant laws and regulations, we may be required to collect, record, hold, use, disclose and store (i.e. "process") personal data and financial information about you, including but not limited to :

- Personal identity Data which includes full names, gender, means of identification, title, date of birth and gender.
- Contact Data includes residential address, email address and telephone numbers.
- Financial Data includes bank account information and Bank Verification Numbers..
- Transaction Data includes details about deposits and payments from and to you and other details of products and services you have purchased from us.
- 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.
- Usage Data includes information about how you use and access our website, products and services. we may aggregate your Usage Data to analyze the percentage of users accessing a specific website feature. However, if we combine or connect the 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.

- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

How We Collect Personal Information

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. We obtain personal information in various ways, including but not limited to :

- when you download Swifia app, purchase or redeem gift cards and/or register an account with Swifia through our website or app;
- through your relationship with us, for example information provided by you when using our products or services, when taking part in customer surveys, giveaways, competitions, promotions and collaborations;
- from an analysis of the way you use and manage your account with us, from the transactions you make and from the payments which are made to/from your account;
- when you contact Swifia through various methods such as email, letters, telephone calls via customer support, social media handles. If you contact us or we contact you using telephone, we may monitor or record the phone call for quality assurance, training and security purposes;
- when we obtain any data and information from third parties;
- from such other sources in respect of which you have given your consent to disclose information relating to you and/or where not otherwise restricted.

How We Use Cookies

Cookies help us give you the best experience of using our site. In this policy we use the term "cookies" to refer to cookies and other similar technologies.

Cookies are small data files that we or companies we work with may place on your computer or other device when you visit our website. They allow us to remember your actions or preferences over time.

We use cookies to collect data that helps us to :

- track site usage and browsing behaviour;
- allow you to log-in to your account and navigate through the website;
- monitor the effectiveness of our promotions and advertising; and
- mitigate risk, enhance security and help prevent fraud.

We use both session and persistent cookies. Session cookies are deleted when you close down your browser, while persistent cookies remain on your device until they expire or you delete them. Persistent cookies allow us to remember things about you when you visit our website again.

To help us monitor the effectiveness of our promotions and advertising, we may provide site usage data obtained through the use of cookies to select third-party service providers. Any data provided by us to these third parties will be encrypted or given unique identifiers.

By signing-up for an account with Swifia, or continuing to use our website, you agree to our use of cookies as set out in this policy. You may decline our cookies if your browser or browser add-on permits, but doing so may interfere with your use of Swifia's services. For information on how to delete or reject cookies, you can consult us through the designated support email address.

How We Use Your Personal Information

Other than as stated above, we may use your personal information for one or more of the following purposes :

- to verify your account in accordance with Know Your Customer (KYC) and Anti-Money Laundering (AML) regulations;
- Provide and manage our gift card services
- to manage and maintain your account with us;
- to better manage our business and your relationship with us;
- to notify you about benefits and changes to the features of products and services;
- to administer offers, competitions and promotions;
- to respond to your enquiries and complaints and to generally resolve disputes;
- to update, consolidate and improve the accuracy of our records as expected by law;
- to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- to conduct research for analytical purposes including but not limited to data mining and analysis of your transactions with us;
- to meet the disclosure requirements of any law binding on Swifia;
- for audit, compliance and risk management purposes;
- to assess financial and insurance risks;
- to conduct anti-money laundering checks; for crime detection, prevention and prosecution; to comply with any sanction requirements;
- for any other purpose that is required or permitted by any law, regulations, guidelines or relevant regulatory authorities.

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.

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 via our support channels.

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.

Disclosure Of Personal Information

As a part of providing you with our products and services, and for the management and operations of these products and services, and to comply with legal and regulatory requirements, we may be required or need to disclose information about you and your account with us to the following third parties :

- companies and organisations that act as our service providers, agents, affiliates and/or professional advisers;
- companies and organisations that assist us in processing or otherwise fulfilling transactions that you have requested(service providers);
- law enforcement, regulatory and governmental agencies;
- your advisers (including but not limited to accountants, auditors, lawyers, financial advisers or other professional advisers) were authorised by you;

- any other person notified by you or under your instruction to use the accounts, products or services on your behalf.

The aforementioned third parties may in some instances be located outside of your country.

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.

Security Of Your Personal Information

Swifia places great importance on ensuring the security of your personal information. We regularly review and implement up-to-date technical and organisational security measures when processing your personal information. Employees of Swifia are trained to handle the personal information securely and with utmost respect and in compliance with data privacy laws, failing which they may be subject to disciplinary action.

However, please note that although we take reasonable steps to protect your information, no website, Internet transmission, computer system, or wireless connection is completely secure. We have therefore 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.

7. International Transfers

The personal information we collect from you may be transferred to, stored and processed outside of the jurisdiction in which you reside, and the laws of those countries may differ from the laws applicable in your own country. For example, information collected in the European Economic Area (EEA) may be transferred to, stored and

processed at a destination(s) outside of the EEA in accordance with relevant data protection regulations. Any processing of such information will be undertaken by a designated employee at Swifia, or the authorised employee of our third-party service providers, whose roles will include verifying your identity, re-confirming your gift card details, processing payment details, and providing customer support. By using our services and submitting your personal data, you agree to the transfer, storing or processing of it outside of your jurisdiction.

Data retention

We will only retain your personal data for the duration of your relationship with us, and afterwards for such a period as may be necessary to protect the interests of Swifia as provided in relevant policies, and as required by the law. 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 with respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount of data, nature and sensitivity of the 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, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, wherein we may use this information indefinitely without further notice to you.

No fee is 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 acknowledge all legitimate requests within 24hrs and resolve any queries within (2) business days. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests or it concerns listed gift card providers. In this case, we will notify you and keep you updated.

Acceptance Of Privacy Policy

By accessing and using any of our services, you signify acceptance to the terms of this Privacy Policy. Where we require your consent to process your personal information in a manner other than as contained in this Privacy Policy, we will ask for your consent to the collection, use, and disclosure of your personal information. Swifia may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific products and services. These notices may supplement or clarify Swifia's privacy practices or may provide you with additional choices about how Swifia processes your data. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our services and products.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your data. You have the right to:

Request access to your personal data. 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 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.

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:

- 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.

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.

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.

Note that If you wish to exercise any of the rights set out above. Please contact us.

Contact us

It is important that the personal data we hold about you is accurate and updated. Please keep us informed if your personal data changes during your relationship with us. Should you have any query in relation to this Privacy Policy or how we handle

your personal information, please email us at
support@Swifia.com.