

# **Privacy Policy for CreditChex Services**

Effective Date: June 01, 2017

## **Your Privacy Rights**

This Privacy Policy describes your privacy rights regarding our collection, use, storage, sharing and protection of your personal information. It applies to CreditChex website and all related sites, applications, services and tools regardless of how you access or use them.

## **Scope and Consent**

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 (collectively “CreditChex services”). This Privacy Policy applies to Nigerian law and is intended to govern the use of CreditChex services by our users (including, without limitation to those who use the CreditChex services in the course of their trade or business) in Nigeria, unless otherwise agreed through contract. We may amend this Privacy Policy at any time by posting a revised version on our website. The revised version will be effective as of the published effective date.

## **Collection of Personal Information**

We collect the following types of personal information in order to provide you with the use of CreditChex services, and to help us personalize and improve your experience.

**Information we collect automatically:** When you use CreditChex services, we collect information sent to us by your computer, mobile phone or other access device. The information sent to us includes, but is not limited to, the following: data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection

information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, and standard web log data and other information. We also collect anonymous information through our use of cookies and web beacons.

**Information you provide to us:** We may collect and store any information you provide us when you use CreditChex services, including when you add information on a web form, add or update your account information, participate in community discussions, chats, or dispute resolutions, or when you otherwise correspond with us regarding CreditChex services.

When you use CreditChex services, we also collect information about your transactions and your activities. In addition, if you use CreditChex services, we may collect the following types of information:

- Contact information, such as your name, address, phone, email and other similar information.
- Financial information, such as the full bank account numbers and/or credit card numbers that you link to your CreditChex account or give us when you use CreditChex services.
- Detailed personal information such as your date of birth, BVN or national ID number.

We may also collect information from or about you from other sources, such as through your contact with us, including our customer support team, your results when you respond to a survey, your interactions with members of the CreditChex corporate family or other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control (whether in part or in whole). Additionally, for quality and training purposes or for its own protection, CreditChex may monitor or record its telephone conversations with you or anyone acting on your behalf. By communicating with CreditChex, you acknowledge that your communication may be overheard, monitored, or recorded without further notice or warning.

**Information from other sources:** We may also obtain information about you from third parties such as credit bureaus and identity verification services.

You may choose to provide us with access to certain personal information stored by third parties such as social media sites (e.g., Facebook, Instagram and Twitter). The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your CreditChex account and authorizing CreditChex to have access to this information, you agree that CreditChex may collect, store and use this information in accordance with this Privacy Policy.

**Authentication and Fraud Detection:** In order to help protect you from fraud and misuse of your personal information, we may collect information about you and your interactions with CreditChex services. We may also evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

**Using Your Mobile Device:** CreditChex may offer the ability to connect with our services using mobile devices either through a mobile application or a mobile optimized website. The provisions of this Privacy Policy apply to all such mobile access and use of mobile devices. When you download or use our mobile applications, or access one of our mobile optimized sites, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalized content. Most mobile devices allow you to control or disable location services in the device's setting's menu. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or the manufacture of your particular device.

## **We Use the Personal Information We Collect**

Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customized experience. We may use your personal information to:

- provide CreditChex services and customer support;
- process transactions and send notices about your transactions;
- verify your identity, including during account creation and password reset processes;
- resolve disputes, collect fees, and troubleshoot problems;
- manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities;
- detect, prevent or remediate violations of policies or applicable user agreements;
- improve the CreditChex services by customizing your user experience;
- measure the performance of CreditChex services and improve their content and layout;
- manage and protect our information technology infrastructure;
- provide targeted marketing and advertising, provide service update notices, and deliver promotional offers based on your communication preferences;
- contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging, as authorized by our User Agreement;
- Perform creditworthiness and solvency checks, compare information for accuracy and verify it with third parties.

We may contact you via electronic means or postal mail to notify you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed, to poll your opinions through surveys or questionnaires, or as otherwise necessary to service your account. Finally, we may contact you as necessary to enforce our policies, applicable law, or any agreement we may have with you. To reach you as efficiently as possible, we may contact you via phone, and may use autodialed or prerecorded calls and text messages. Where applicable and permitted by law, you may decline to receive certain communications.

## **Marketing**

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your personal information with information we collect from other companies and use it to improve and personalize CreditChex services, content, and advertising. If you do not wish to receive marketing communications from us or participate in our ad-customization programs, simply indicate your preference by logging into creditchex.net and filling our contact information, updating your preferences, or by following the directions that may be provided within the communication or advertisement. We respect your communication preferences. If you no longer wish to receive notifications via our application, you can adjust your preferences by visiting the settings page of the application.

## **How We Use Cookies and Similar Technologies**

When you access our website or use CreditChex services, we (including companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, e-tags, "Flash cookies," or other local storage provided by your browser or associated applications (collectively "Cookies"). We use these technologies to recognize you as a customer; customize CreditChex services, content, and advertising; measure promotional effectiveness; help ensure that your account security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety across our sites and CreditChex services.

You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our website and CreditChex services.

**Do Not Track:** Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not currently respond to DNT signals. We do, however, provide you notice of the tracking by advertisers and other third parties in our Privacy and Cookies policies.

## **How We Protect and Store Personal Information**

Throughout this Privacy Policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific user. Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, the use of third-party service providers. We, and third-party service providers on our behalf, store and process your personal information in Nigeria, the United States and elsewhere in the world. If your information is transferred to other countries, including countries which may not have data protection laws that provide the same level of protection that exist in Nigeria, we will protect the information as described in this Privacy Policy. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to data centers, and information access authorization controls.

## **How We Share Personal Information with Other CreditChex Users**

When transacting with others, we may provide those parties with information about you necessary to complete the transaction, such as your name, account ID, contact details, shipping and billing address, or other information needed to promote the reliability and security of the transaction. If a transaction is held, fails, or is later invalidated, we may also provide details of the unsuccessful transaction. To facilitate dispute resolution, we may provide a buyer with the seller's address so that goods can be returned to the seller.

The receiving party is not allowed to use this information for unrelated purposes, such as to directly market to you, unless you have agreed to it. Contacting users with unwanted or threatening messages is against our policies and constitutes a violation of our policies.

## How We Share Personal Information with Other Third Parties

We may share your personal information we collect from you, including your name, contact details, and transactions and activities, with:

- Credit bureaus and collection agencies to report account information, as permitted by law.
- Banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you meet their criteria which includes having CreditChex close your CreditChex Account due to your breach of the CreditChex Agreement).
- Companies that we plan to merge with or are acquired by. (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. If your personal information could be used contrary to this policy, you will receive prior notice.)
- Law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other legal process or requirement applicable to CreditChex or one of its affiliates; when we need to do so to comply with law or credit card rules; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our Agreement.
- Other unaffiliated third parties, for the following purposes:
  - Fraud Prevention and Risk Management: to help prevent fraud or assess and manage risk.
  - Customer Service: for customer service purposes, including to help service your accounts or resolve disputes (e.g., billing or transactional).
  - Shipping: in connection with shipping and related services for purchases made using CreditChex.
  - Legal Compliance: to help them comply with anti-money laundering and counter-terrorist financing verification requirements.
  - Service Providers: to enable service providers under contract with us to support our business operations, such as fraud prevention, bill collection, marketing, customer service and technology services. Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.
- Other third parties with your consent or direction to do so.

Please note that these third parties may be in other countries where the laws on processing personal information may be less stringent than in Nigeria. If you open a CreditChex account directly on a third party website or via a third party application, any information that you enter on that website or application (and not directly on a CreditChex website) will be shared with the owner of the third party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with personal information. CreditChex is not responsible for the content or information practices of such third parties.

### **How You Can Access or Change Your Personal Information**

You can review and edit your personal information at any time by logging in to your account and reviewing your account Settings and Profile. You can also close your account through the CreditChex website. If you close your CreditChex account, we will mark your account in our database as "Closed," but may retain personal information from your account for a certain period of time and disclose it in a manner consistent with our practices under this Privacy Policy for accounts that are not closed. We also may retain personal information from your account to collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce our User Agreement, or take other actions as required or permitted by law.