

Privacy Policy for THC apps

This Privacy Policy explains what personal data is collected when you use irede.com, THC Mobile application (“THC”), THC Web application, the services provided, and how such personal data will be used and shared.

BY USING THE SERVICE, YOU PROMISE US THAT;

(I) YOU HAVE READ, UNDERSTOOD, AND AGREED TO THIS PRIVACY POLICY.

(II) YOU ARE OVER 16 YEARS OF AGE (OR HAVE HAD YOUR PARENT OR GUARDIAN READ AND AGREE TO THIS PRIVACY POLICY FOR YOU).

If you disagree or cannot make this promise, you must not use the Service. In such a case, you MUST contact the support team via email to request the deletion of your account and data.

“Process”, in respect of personal data, includes collecting, storing, and disclosing to others.

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1. PERSONAL DATA CONTROLLER

IREDE/THC Nigeria Limited, a company registered in the Federal Republic of Nigeria will be the controller of your personal data.

2. CATEGORIES OF PERSONAL DATA WE COLLECT

We collect data you give us voluntarily (for example, an email address). We also collect data automatically (for example, your IP address).

2.1 Data you give us.

You may be asked to provide us information about yourself when you register for and/or use the Service. This information includes; first name, last name, phone number, email, gender, date of birth (together regarded as “Required Information”), address details, working hours, etc., as well as access to your photos, albums, and their metadata. You will need to provide us with your ID or similar identification document if you want to post an advertisement in the Mobile Phones category, unblock your account, or make a duplicate primary account.

To use our Services and register an account, you will need to provide the Required Information. You will be able to use the Service even if you do not give this data to us, but some of the

Service’s functionality may be limited to you.

Sometimes you may also need to provide us additional information in the communication with our Support Team to fulfill your request (for example, if your account was previously blocked, we may ask you to confirm your identity by providing an ID).

You should carefully consider risks associated with the fact that you make certain information – in particular, your phone number, address, photos, passport, and exact location – publicly available.

2.2. Data provided to us by third parties.

When you decide to log in using Meta, we get personal data from your Meta account. This includes your profile image, name, and Meta ID. Unless you “opt-out” on the Meta Login screen, we will also collect other data, such as email address, gender, date of birth, friends list, and location as listed in your Meta profile.

For more information, please refer to the Meta Permissions Reference (describes the categories of information, that Meta may share with third parties and the set of requirements) and to the Meta Data policy. In addition, Meta lets you control the choices you made when connecting your Meta profile to the App on their Apps and Websites page.

When you log in with Google, we get your name, email address, profile picture, and Google ID. We use your personal data from Google in accordance with this Privacy Policy. To know more about how Google processes your data, visit its Privacy Policy. To remove access granted to us, visit Google Permissions.

When you decide to log in using Apple, we get your Apple ID, name, and email from your account. You can use the Hide My Email function while signing in with Apple, and it will create and share a unique, random email address that will forward our messages to your personal email.

Apple lets you revoke access provided to the App on your Apple ID Manage Page by following the next steps.

When you decide to log in or verify your phone number using Truecaller, we get personal data from your Truecaller user profile upon your consent. This includes your phone number, name, addresses (country code; city; street; zip code), profile image, job title, company name, gender, and other information from your profile. For more information, please refer to the Truecaller Privacy Policy.

If you were invited to create an account in the Service, the person who invited you can provide personal information about you, such as your phone number, email address, social media account or other contact information.

We may collect your name, official government ID number, and photo image to confirm your identity. For this, we will share this information with a 3rd party service provider, Smile Identity Inc., in order to validate it with the governmental sources. Smile Identity Inc. may use your ID number to collect the following additional data on you from governmental sources: full name, date of birth, image, address, phone number, gender, government ID expiry date, or other additional information associated with your ID number that the issuing authority may provide. Smile ID may process or store your data outside of the borders of your country.

2.3. Data we collect automatically:

Data about how you found us

We collect data about your referring URL (that is, the place on the Web where you were when you tapped on our ad).

2.3.2. Device and Location Data.

We collect data from your device. Examples of such data include language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID, and Meta ID.

2.3.3. Usage data

We record how you interact with our Service. For example, we log the features, and content you interact with, how often you use the Service, how long you are on the Service, what sections you use, and how many ads you watch.

2.3.4. Advertising IDs

We collect your Apple Identifier for Advertising (“IDFA”) or Google Advertising ID (“AAID”) (depending on the operating system of your device). You can typically reset these numbers through the settings of your device’s operating system (but we do not control this).

2.3.5. Transaction data

When you make payments through the Service, you need to provide financial account data, such as your credit card number, to our third-party service providers. We DO NOT collect or store full credit card number data, though we MAY receive credit card-related data, data about the transaction, including the date, time, and amount of the transaction, and the type of payment method used.

2.3.6. Cookies

Please see our Cookies Policy to find out more about our use of cookies.

3. DATA PROTECTION PRINCIPLES

In our data protection practices we strive, in particular, to provide that personal data is:

- processed in accordance with specific, legitimate, and lawful purpose consented to by you;
- adequate, accurate, and without prejudice to the dignity of the human person;
- stored only for the period within which it is reasonably needed; and
- secured against reasonably foreseeable hazards and breaches such as theft, cyberattack, viral attack, dissemination, manipulations of any kind, damage by rain, fire, or exposure to other natural elements.

4. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA

We process your personal data:

4.1. To provide our Service

This includes enabling you to use the Service in a seamless manner and preventing or addressing Service errors or technical issues.

4.2. To customize your experience

We process your personal data to adjust the content of the Service and make offers tailored to your personal preferences and interests.

4.3. To manage your account and provide you with customer support

We process your personal data to respond to your requests for technical support, Service information, or any other communication you initiate. This includes accessing your account to address technical support requests. For this purpose, we may send you, for example, notifications or emails about the performance of our Service, security, payment transactions, notices regarding our Terms of Use or this Privacy Policy.

4.4. To communicate with you regarding your use of our Service

We communicate with you, for example, by push notifications or in the chat. As a result, you may, for example, receive a notification whether on the Website or via email that you received a new message on IREDE/THC. To opt out of receiving push notifications, you need to change the settings on your browser or mobile device. To opt out of certain types of emails, you need to click the “unsubscribe” link located in the footer of the email, by contacting our support team at support@irede.com, or in your profile settings.

The services that we use for these purposes may collect data concerning the date and time when the message was viewed by our users, as well as when they interacted with it, such as by clicking on links included in the message.

4.5. To research and analyze your use of the Service

This helps us to better understand our business, analyze our operations, maintain, improve, innovate, plan, design, and develop IREDE/THC and our new products. We also use such data for statistical analysis purposes, to test and improve our offers. This enables us to better understand what features and sections of IREDE/THC our users like more, and what categories of users use our Service. As a consequence, we often decide how to improve IREDE/THC based on the results obtained from this processing.

4.6. To send you marketing communications

We process your personal data for our marketing campaigns. We may add your email address to our marketing list. As a result, you will receive information about our products, such as for example, special offers, and products of our partners. If you do not want to receive marketing emails from us, you can unsubscribe following instructions in the footer of the marketing emails, by contacting our support team at support@irede.com, or in your profile settings.

We may also show you advertisements on the Website, and send you push notifications for marketing purposes. To opt out of receiving push notifications, you need to change the settings on your device and/or browser.

4.7. To personalize our ads

We and our partners use your personal data to tailor ads and possibly even show them to you at the relevant time. For example, if you have visited our Website, you might see ads for our products, for example, in your Meta feed.

We may target advertising to you through a variety of ad networks and exchanges, using data from advertising technologies on and off of our Services like unique cookies or similar tracking technology, pixel, device identifiers, geolocation, operation system information, and email.

How to opt-out or influence personalized advertising

iOS: On your iPhone or iPad, go to “Settings,” then “Privacy” and tap “Advertising” to select “Limit Ad Track”. In addition, you can reset your advertising identifier (this also may help you to see less of personalized ads) in the same section.

Android: To opt out of ads on an Android device, simply open the Google Settings app on your mobile phone, tap “Ads” and enable “Opt out of interest-based ads”. In addition, you can reset your advertising identifier in the same section (this also may help you to see less personalized ads).

4.8. To enforce our Terms and Conditions of Use and to prevent and combat fraud

We use personal data to enforce our agreements and contractual commitments, to detect, prevent, and combat fraud. As a result of such processing, we may share your information with others, including law enforcement agencies (in particular, if a dispute arises in connection with our Terms of Use).

4.9. To comply with legal obligations

We may process, use, or share your data when the law requires it, in particular, if a law enforcement agency requests your data by available legal means.

4.10. To process your payments

We provide paid products and/or services within the Service. For this purpose, we use third-party services for payment processing (for example, payment processors). As a result of this processing, you will be able to make a payment and use the paid features of the Service.

5. UNDER WHAT LEGAL BASES WE PROCESS YOUR PERSONAL DATA

We process your personal data, in particular, under the following legal bases:

5.1. your consent;

On this basis, we use your cookies as described in our Cookies Policy.

5.2. to perform our contract with you;

5.3. for our (or others) legitimate interests; Under this legal basis we, in particular:

- communicate with you regarding your use of our Service

This includes, for example, sending you push notifications reminding you that you have unread messages. The legitimate interest we rely on for this purpose is our interest to encourage you to use our Service more often. We also take into account the potential benefits to you.

- research and analyze your use of the Service

Our legitimate interest for this purpose is our interest in improving our Service so that we understand users' preferences and are able to provide you with a better experience (for example, to make the use of our mobile application easier and more enjoyable, or to introduce and test new features).

- send you marketing communications

The legitimate interest we rely on for this processing is our interest in promoting our Service in a measured and appropriate way.

- personalize our ads

The legitimate interest we rely on for this processing is our interest in promoting our Service in a reasonably targeted way.

- enforce our Terms of Use and to prevent and combat fraud

Our legitimate interests for this purpose are enforcing our legal rights, preventing and addressing fraud and unauthorized use of the Service, and non-compliance with our Terms of Use.

5.4. to comply with legal obligations.

6. WITH WHOM WE SHARE YOUR PERSONAL DATA

We share information with third parties that help us operate, provide, improve, integrate, customize, support, and market our Service. We may share some sets of personal data, in particular, for purposes and with parties indicated in Section 2 of this Privacy Policy. The types of third parties we share information with include, in particular:

6.1. Service providers

We share personal data with third parties that we hire to provide services or perform business functions on our behalf, based on our instructions. We may share your personal information with the following types of service providers:

- cloud storage providers (Amazon, DigitalOcean, Hetzner)
- data analytics providers (Facebook, Google, Appsflyer)
- login service providers (Google, Apple, Facebook, Truecaller)
- marketing partners (in particular, social media networks, marketing agencies, and email delivery services; such as Facebook, and Google)
- payment services providers (Solid, Paystack)
- local banks and other financial institutions.

6.2. Law enforcement agencies and other public authorities

We may use and disclose personal data to enforce our Terms of Use, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, or in other cases provided for by law.

6.3. Third parties as part of a merger or acquisition

As we develop our business, we may buy or sell assets or business offerings. Customers' information is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g. parent company or subsidiary) and may transfer such information in the course of a corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

7. AVAILABLE REMEDIES

If there is a data breach that may cause a risk to the rights and freedoms of individuals, we will notify competent supervisory authorities, when such notification is mandatory. If the risk is assessed by us as "high", we will also notify the affected data subjects without undue delay. The time frame for such notification will be developed by us on the basis of the number of affected data subjects and the time needed to collect contact information for notifications.

If the measures taken or proposed to be taken in response to the breach did not address your concerns, you have the right to lodge a complaint with a competent supervisory authority, or to seek redress in a court of competent jurisdiction.

8. NO LIMITATION CLAUSE

No limitation of liability shall avail us in case we act in breach of the principles set out in Section 3.

9. HOW YOU CAN EXERCISE YOUR RIGHTS

To be in control of your personal data, you have the following rights:

Accessing/reviewing/updating/correcting your personal data. You may review, edit, or change the personal data that you had previously provided to IREDE/THC in the settings section on the Website.

You may also request a copy of your personal data collected during your use of the Service.

Deleting your personal data. You can request erasure of your personal data by sending us an email at support@irede.com or you can delete your account via the link.

When you request the deletion of your personal data, we will use reasonable efforts to honor your request. In some cases, we may be legally required to keep some of the data for a certain time; in such an event, we will fulfill your request after we have complied with our obligations.

Objecting to or restricting the use of your personal data (including for direct marketing purposes). You can ask us to stop using all or some of your personal data or limit our use thereof.

The right to lodge a complaint with supervisory authority. We would love you to contact us directly, so we could address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority.

To exercise any of your privacy rights, please send a request to support@irede.com.

10. AGE LIMITATION

We do not knowingly process personal data from persons under 16 years of age. If you learn that anyone younger than 16 has provided us with personal data, please contact us at support@irede.com

11. INTERNATIONAL DATA TRANSFERS

We may transfer personal data to countries other than the country in which the data was originally collected in order to provide the Service set forth in the Terms of Use and for purposes indicated in this Privacy Policy. If these countries do not have the same data protection laws as the country in which you initially provided the information, we deploy special safeguards. In particular, if we transfer personal data originating from the EEA to countries with not adequate level of data protection, we use one of the following legal bases: (i) Standard Contractual Clauses approved by the European Commission (details available here), or (ii) the European Commission adequacy decisions about certain countries (details available here).

12. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time. If we decide to make material changes to this Privacy Policy, you will be notified through our Service or by other available means and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.

13. DATA RETENTION

We will store your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy (including providing the Service to you), which includes (but is not limited to) the period during which you have an Irede/the account. We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We will store your hashed email address, phone number, identification documents, and information on the fact your account has been blocked after fulfilling your request to delete your personal data.

We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

14. CONTACT US

You may contact us at any time for details regarding this Privacy Policy and its previous versions. For any questions concerning your account or your personal data, please contact support@irede.com