

INTRODUCTION

Welcome to Paay, a product and platform developed and operated by Corbane Digital Tech Ltd. The term 'Paay' encompasses all of our products and platform services. Our proprietary software facilitates your interactions with us, whether you are using our website or app. If you have any questions or need assistance with your platform usage, please refer to our Terms of Use or contact us at (email address).

At Corbane Digital Tech Ltd, we recognize the importance of safeguarding your information and are dedicated to maintaining the trust you've vested in us. Our Privacy Policy outlines the Personal Information we collect, the reasons behind its collection, and the limited circumstances under which we may share it with third-party service providers in the context of escrow services. This policy also elucidates how we leverage your information to enhance your experience with our Paay platform.

OVERVIEW

The purpose of this Privacy Policy is to clarify your privacy rights concerning the collection, usage, storage, sharing, and protection of your information within our comprehensive digital infrastructure. This infrastructure includes our website, payment platforms, and software applications, as well as email notifications and tools. It is applicable to all Websites, Apps, and/or Platforms provided by Corbane Digital Tech Ltd.

It's important to note that while you're not obligated to provide us with your information, if you intend to use our services, we will need to request certain information from you.

DEFINITIONS

Account: This refers to the personalized digital space that users create when registering on the Paay Website or App. The Account serves as the central hub for users to access and perform various actions and functions available on the Paay platform. It offers users a unique set of tools and features tailored to their specific needs, enabling them to seamlessly navigate through the Paay ecosystem.

Cookies: These are small data files that are automatically downloaded onto a user's computer or mobile device when they access our platform. These files allow us to

retrieve important information such as login credentials, IP addresses, web traffic statistics, visit counts, browser types and versions, device details, and timestamps.

Our use of cookies is governed by our cookie policy, which can be found on our website and provides more detailed information on the specific types of cookies we use, how we use them, and their impact on your user experience. For more information, please refer to our cookie policy.

Client: This specifically refers to individuals who use the Paay platform for payment and escrow services.

Paay: This refers to a digital platform developed by Corbane Digital Tech Ltd, a company based in Nigeria. The platform is designed to facilitate secure financial transactions between buyers and sellers. By using Paay, users can make payments to sellers with the assurance that their funds will be held in escrow until the goods or services are received and verified.

Payment Information: This refers to any data that users provide to Paay for the purpose of making payments through the platform. Such information may include credit card details, bank account information, and other relevant payment credentials.

Personal Information: This refers to any information that could be used to identify an individual, including but not limited to an individual's email address, company name, password, payment card information, financial details such as [specific financial data needed for your service], internet protocol (IP) address, login information, address, location, device, or transaction data.

Privacy Settings: On the Paay platform, these refer to a set of configurable options that allow users to personalize and manage their privacy preferences. These options include the ability to control the visibility of personal information and account settings, as well as to adjust the frequency and types of notifications received from the platform. Users can customize their Privacy Settings to strike a balance between their privacy concerns and their desire for seamless transactions through Paay.

Service Providers: On the Paay platform, these refer to third-party companies or individuals contracted by Corbane Digital Tech Ltd to perform specific tasks on behalf of Paay. These tasks may include payment processing, data analysis, customer support, and other services necessary for the operation of Paay. These Service Providers are granted access to users' Personal Information only to the extent

required to perform their assigned tasks and are bound by strict confidentiality agreements to protect users' privacy and financial information.

Sites: These refer to any digital media, including but not limited to mobile applications, websites, social media platforms, or any other online platforms that provide information or services related to Paay. These sites may be owned or operated by Paay or by third parties affiliated or not affiliated with Paay.

Special Categories of Personal Information: This term describes particularly sensitive information that pertains to an individual. It may include, but is not limited to, details about a person's financial status, transaction history, and payment information. Given the sensitive nature of this information, it is subject to special protections under applicable laws and regulations to ensure responsible and secure handling.

Terms of Use: These refer to a set of guidelines and rules that govern the use of Paay by its users. The terms of use outline the conditions and limitations of using Paay, including user behavior, content restrictions, and user responsibilities. This agreement is typically presented to users upon accessing Paay and requires their agreement to use the platform's services.

User Agreement: This refers to a legally binding agreement between Paay and its users that outlines the terms and conditions of using the platform, as well as the rights and responsibilities of both parties. This agreement covers a wide range of topics, including financial transactions, dispute resolution procedures, and user responsibilities. The user agreement is typically presented to users upon signing up on Paay and requires their acceptance to access the platform's services.

User: A user is an individual who accesses the Paay platform and its services. A user may include anyone who has agreed to use and abide by the terms and conditions set forth in the Paay User Agreement and/or the Terms of Use. Users may include buyers, sellers, and any other party who accesses the Paay platform for financial transactions and escrow services.

OBJECTIVE

The objective of our Privacy Policy is to promote transparency and build trust between Paay and the individuals and organizations whose Personal Information we collect. We are committed to providing clear, concise, and easily accessible information about the types of data we collect, the purposes for which we collect it, and the measures we

have in place to secure the data. Our aim is to empower you to make informed decisions about sharing your personal information with us.

We maintain the highest standards of privacy protection and ensure compliance with applicable data protection laws and regulations, including global data protection regulations and local regulations relevant to Corbane Digital Tech Ltd's operations.

Our Privacy Policy is an integral part of our commitment to safeguarding your privacy, and we are dedicated to regularly reviewing and updating it to reflect the evolving nature of our business and the changing regulatory landscape.

Our Privacy Principles

At Paay, our approach to data protection is grounded in our commitment to ensuring the privacy and security of personal information entrusted to us. Our data protection principles embody this commitment and guide our actions regarding the collection, use, and disclosure of personal information.

At Paay, we are guided by the following core principles:

- **Ensuring Security and Protection:** We recognize the importance of maintaining the confidentiality and integrity of personal information and take appropriate measures to safeguard it against unauthorized access, use, disclosure, or loss.
- **Empowering the Individual:** We believe in individuals' right to control their personal information and make informed decisions about its use. We strive to provide our users with the tools and resources they need to manage their personal information effectively.
- **Transparency and User Education:** We understand that transparency is crucial for building trust with our users. Therefore, we are committed to being transparent about our data collection practices and providing our users with clear and concise information about how their personal information is used.
- **Compliance with Local Laws:** As a global organization, we recognize the importance of complying with local privacy laws and regulations. We ensure that our data protection practices are consistent with the requirements of applicable laws and regulations and work closely with privacy experts to stay in line with best practices and emerging trends.

- **User Rights:** We respect and uphold the rights of individuals to access, rectify, delete, and restrict the processing of their personal information. We are also committed to supporting the right to data portability and the right to object to the processing of personal information.
- **Information Accuracy:** We believe in the accuracy, completeness, and up-to-dateness of personal information to deliver our services effectively. Therefore, we have implemented measures to ensure that the personal information we collect is accurate, complete, and up-to-date.
- **Third-Party Sharing:** At Paay, we believe in full transparency about the sharing of personal information with third parties. We obtain appropriate consent when required and maintain strict controls over the use and sharing of personal information.
- **Data Minimization:** We adhere to the principle of data minimization and collect only the minimum amount of personal information required to provide our services. This approach helps us maintain the security and privacy of the personal information we collect and minimize the risk of data breaches.
- **Data Retention:** We retain personal information only for as long as necessary to achieve the purposes for which it was collected, as required by applicable laws and regulations. We have implemented strict data retention policies to ensure that personal information is not retained for longer than necessary.
- **User Control and Consent:** We believe that individuals should have full control over their personal information and the right to provide informed consent for its collection and use. We maintain transparency throughout the data collection process and provide clear explanations of how personal information will be used.
- **Need-to-Know Basis for Personal Information:** At Paay, we follow a selective approach to the collection and storage of personal information. We do not collect or store more personal information than necessary to facilitate secure financial transactions, and we ensure that the personal information we collect is relevant to the service provided.
- **Children's Privacy:** Protecting the privacy of children is of utmost importance to us at Paay. We take appropriate measures to ensure that we do not collect personal information from children under the age of 18 without obtaining

appropriate parental consent. If we discover we have collected personal information from a child without parental consent, we will promptly take steps to remove that information from our systems.

- **International Data Transfers:** Paay operates globally and may transfer personal information to countries outside of the country where it was originally collected. We take all necessary steps to ensure that any international transfers comply with applicable laws and regulations. We may transfer personal information to countries with different privacy laws, but we always take steps to ensure that the personal information is protected in accordance with this Privacy Policy.

Please note that we may revise and update our Privacy Policy as part of our continuous review and improvement of our data protection practices to ensure they align with legal and regulatory requirements. We will notify you of any material changes to our Privacy Policy by posting an updated version on our website or apps. Your continued use of our services following such changes constitutes your agreement to be bound by the revised Privacy Policy. We encourage you to review our Privacy Policy periodically to stay informed of any updates or changes.

Table of Contents

1. **Information We Collect:** Personal Information We Gather About You
2. **Data Collection and Purpose:** How and Why We Collect Your Personal Information
3. **Use of Personal Information:** How We Utilize Your Personal Data
4. **Data Security and Retention:** Safeguarding and Storing Your Data
5. **Disclosure of Personal Information:** Sharing Your Personal Data
6. **Marketing:** Utilizing Your Information for Marketing
7. **Your Data Protection Rights and Choices:** Your Rights and Options Regarding Your Personal Information
8. **Cookies:** Our Utilization of Cookies and Similar Technologies
9. **International Transfers:** Transferring Personal Information Beyond Your Country
10. **Data Protection Officer:** Details About Our Data Protection Officer
11. **Training:** Employee Education on Data Protection
12. **Data Protection Audit:** Our Internal Audit Procedures for Data Protection
13. **Dispute Resolution and Complaints:** Resolving Disputes and Filing Complaints
14. **Your Consent:** Granting Consent for the Use of Your Personal Information

1. **Information We Collect: Personal Information We Gather About You**

At Paay, we collect, process, store, use, and transfer your personal information to provide our services to you in compliance with regulatory requirements. This includes but is not limited to the following types of personal information:

- **Identity Data:** This includes your full name, government-issued identification number, and date of birth. We collect this information to verify your identity and ensure compliance with regulatory requirements. For healthcare professionals, we may also collect verification documents to confirm their professional credentials.
- **Contact Data:** This encompasses information necessary to reach you, such as your contact address, email address, telephone number, details of the device you use, and billing details.
- **Identification Documents:** For healthcare professionals, we may collect identification documents, like a copy of their professional license, association membership, or other registration information, to verify their eligibility to use our services and comply with regulatory requirements.
- **Log/Technical Information:** When you use Paay's services, our servers automatically collect technical information that your browser sends whenever you visit a website. This may include links you've clicked on, length of visit on certain pages, unique device identifier, log-in information, location, and other device details.
- **Financial Data:** This refers to information such as your Bank Verification Number (BVN), personal account number, the merchant's name and location, and the date and total amount of the transaction.
- **Marketing and Communications Data:** This includes records of your decisions to subscribe or unsubscribe from receiving marketing materials from us or our third parties, as well as records of your discussions with us if we contact you or if you contact us.
- **Non-Personal Information or Anonymized Data:** We may also collect, store, use, and transfer statistical or demographic data that doesn't personally identify you.

We do not collect any Special Categories of Personal Information, but if we do, we will ensure compliance with applicable laws.

Please note that this Privacy Policy applies to Paay's services only. We do not control the content or privacy policies of third-party websites displayed or linked from within our services. These other sites may collect your personal information, place their own cookies, or solicit information from you. We are not responsible for their privacy practices and policies. Please review the privacy policies of these third-party websites and set appropriate controls from your settings when using any third-party services.

Please also be aware that we may modify or update this Privacy Policy at any time, with changes being effective upon posting the updated Privacy Policy on our website or Apps.

2. Data Collection and Purpose: How and Why We Collect Your Personal Information

When you use Paay or any other product offerings from us, we may collect personal information about you. This data collection serves several purposes.

Firstly, we rely on your explicit consent to collect your personal information when you use our services. Your consent ensures that we collect your information lawfully and transparently.

Secondly, we have a legal obligation to collect and store your personal information to comply with applicable financial regulations, such as Anti-Money Laundering and Counter-Terrorist Financing Laws. This information helps us protect against fraud and maintain regulatory compliance. We take data protection laws and regulations seriously, and we are committed to providing our services in compliance with these regulations.

Thirdly, we have a contractual obligation to collect your personal information to enable us to provide our services to you. Without your personal information, we cannot provide you with the services you require.

Therefore, we collect and use your personal information solely for the purpose of providing our services to you and in accordance with applicable laws and regulations.

3. Use of Personal Information: How We Utilize Your Personal Data

The personal information we collect from you serves various purposes in delivering our services. These include creating and managing your accounts, identity verification, and responding to your inquiries. We also use this information for processing payment transactions, encompassing authorization, clearing, chargebacks, and dispute resolution activities. Furthermore, we employ measures to prevent fraud, unauthorized transactions, claims, and other related liabilities.

Recognizing the sensitivity of medical information, we take extra precautions to ensure its secure handling. Your personal information helps us comprehend your medical history and provide personalized services tailored to your specific needs. We also utilize your information for the provision, administration, and communication of products, services, offers, programs, and promotions offered by Paay.

Additionally, we evaluate and enhance our business, including the development of new products and services. We also target advertisements, newsletters, and service updates based on your interests and preferences. Data analytics aids in optimizing our website, products, and services, as well as improving service delivery. We may also need to establish, exercise, and defend legal rights as required and comply with applicable laws and regulations, including compliance with health-related acts and regulations, to further improve our website, products, or services, user experiences, and service optimization.

In summary, we collect and utilize your personal information for multiple purposes, including account management, payment processing, fraud prevention, communication about our products and services, compliance with legal requirements, and data analytics for enhancement. Additionally, we leverage your personal information to provide personalized healthcare services. Any other purposes for using your information will be communicated at the time of collection.

4. Data Security and Retention: Safeguarding and Storing Your Data

Ensuring the security and safeguarding of your Personal Information remains a top priority for Paay. Recognizing the sensitivity of medical data, we are committed to taking essential steps to protect the information collected from our users. To achieve this, we've implemented various administrative, technical, and physical controls designed to secure your Personal Information against unauthorized access, disclosure, misuse, modification, loss, or theft.

Our comprehensive security measures encompass secure servers, firewalls, data encryption, and limited access to your information, granted exclusively for job-related duties to authorized employees.

If you use a password for your account, it's crucial to maintain its confidentiality and avoid sharing it with others to further ensure the safety of your information.

At Paay, we adhere to strict principles and best practices when handling your Personal Information to maintain its confidentiality and protection. While complete online security can't be guaranteed, we make every reasonable effort to secure and protect your Personal Information.

We retain your personal information on our servers only for the duration necessary to provide our services to you. In cases where you close your account, we maintain your information on our servers to adhere to regulatory obligations and for fraud detection, monitoring, and prevention purposes. We retain your Personal Information in accordance with the limitation periods specified by applicable laws and regulations.

Be assured that Paay is wholly committed to safeguarding your Personal Information, and we continuously review and enhance our security measures to ensure the ongoing safety and security of your data.

5. Disclosure of Personal Information: Sharing Your Personal Data

"Paay," operated by "Corbane Digital Tech Ltd," may need to share your Personal Information with third parties as necessary for the purposes outlined in this policy. These third parties may include our affiliates, employees, officers, service providers, agents, suppliers, subcontractors, and other trusted businesses or individuals. We will ensure that any third-party processing of your personal information is carried out in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

We will only share your Personal Information with external third parties in the following limited circumstances:

- **With Your Consent:** We will require your opt-in consent before sharing any personal information.

- **With Third Parties Directly Authorized by You:** For example, if you authorize a third-party application provider to access your account. In this case, the third party's use of your Personal Information will be subject to their own privacy policy, and "Paay" shall not be liable for any breach that may arise from such authorization by you.

We may also share your personal information if we have a good faith belief that access, use, preservation, or disclosure of such information is reasonably necessary to:

- Comply with applicable law, regulation, legal process, or enforceable governmental request.
- Enforce applicable Terms of Service, including the investigation of potential violations thereof.
- Detect, prevent, or otherwise address fraud, security, or technical issues; or
- Protect against imminent harm to the rights, property, or safety of "Paay," its users, or the public as required or permitted by law.
- If "Paay" becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will provide notice before personal information is transferred and becomes subject to a different privacy policy.

We take the privacy and security of your personal information seriously and will take all necessary measures to ensure its protection. It is important to note that despite our efforts to protect your Personal Information, no method of transmission over the internet or method of electronic storage is completely secure. However, we use industry-standard security measures such as secure servers, firewalls, data encryption, and access only granted to employees for job-related duties to safeguard your information from unauthorized access, disclosure, copying, misuse, or modification.

We once again reiterate that if you use a password for any of your accounts, please ensure that you keep it confidential and do not share it with anyone. We only store personal information on our servers for as long as necessary to provide services to you. If you close your account, we will retain your information on our servers to comply with regulatory obligations and for fraud monitoring, detection, and

prevention purposes. We retain your Personal Information in compliance with the limitation periods under applicable laws.

6. Marketing: Utilizing Your Information for Marketing

"Paay," operated by "Corbane Digital Tech Ltd," may utilize your Personal Information to contact you and provide information about our products, services, or surveys. If you do not wish to receive marketing content from us, you have the right to object or opt out. However, please note that even if you choose to opt out, we may still need to communicate with you regarding our ongoing business relationship or transactions related to our Services.

Moreover, we may request your authorization to send notifications to you, but our Services will continue to operate effectively even if you choose not to grant us consent to send notifications.

7. Your Data Protection Rights and Choices: Your Rights and Options Regarding Your Personal Information

As a valued user of our Services, you have certain rights concerning the Personal Information we collect from you, depending on your location and the applicable laws. These rights include:

- The right to be informed about our use of your Personal Information and how we protect your privacy.
- The right to access or obtain a copy of your Personal Information by logging into your account or contacting us directly.
- The right to request that we erase your Personal Information. However, this right is limited to specific circumstances, such as when the data is no longer required or legally justified for processing. We may retain a core set of your Personal Information for compliance purposes or to prevent future contact if you object to your data being used for marketing purposes.
- The right to rectify any Personal Information that may be inaccurate or incomplete.

- The right to object to the processing of your Personal Information for marketing purposes by adjusting your notification preferences or using the unsubscribe link provided in marketing emails.
- The right to object to processing in certain circumstances, which may affect our ability to provide you with our Services.
- The basis for processing your Personal Information is your consent, which you can withdraw at any time.

You may deactivate your account at any time by contacting us.

If you wish to exercise any of these rights, please contact us using the information provided below. For security reasons, we may ask you to provide proof of your identity if we are unsure of your identity.

We take your privacy and the protection of your Personal Information seriously and are committed to providing you with transparent information on how we use your data.

Please go on with the review of our Privacy Policy for additional details on our data practices.

8. Cookies: Our Utilization of Cookies and Similar Technologies

Similar to many other websites, "Paay," operated by "Corbane Digital Tech Ltd," utilizes cookies to enhance our services and tailor your experience. Cookies assist us in distinguishing you from other users and remembering your preferences. By using our website, you consent to our use of cookies.

Your web browser may automatically accept cookies, but you can adjust your settings to decline cookies or receive notifications when a website attempts to place a cookie on your device. However, please be aware that disabling cookies may limit your access to certain features of our website.

For more details on how we use cookies and similar technologies, please refer to our Cookie Policy, available on our website or by contacting us using the information provided below.

9. International Transfers: Transferring Personal Information Beyond Your Country

When it is necessary to transfer your Personal Information to a location outside of Nigeria, we take appropriate steps to ensure that your data is protected and that the transfer is in compliance with the Nigerian Data Protection Act, 2023, and that of the recipient country. These measures may include implementing appropriate contractual safeguards with the recipient of your Personal Information, verifying that the recipient has suitable data protection measures in place, and obtaining your explicit consent for the transfer.

We prioritize the security of your Personal Information and are committed to ensuring that it is safeguarded at all times, regardless of its location. Please note that you have the right to request further information regarding any such transfers of your Personal Information outside of Nigeria and to obtain a copy of the relevant safeguards that we have put in place to protect your data during such transfers.

If you have any concerns or questions regarding the transfer of your Personal Information outside of Nigeria, please do not hesitate to contact us.

10. Data Protection Officer: Information About Our Data Protection Officer

We have appointed a Data Protection Officer (DPO) at Paay operated by Corbane Digital Tech Ltd, to oversee and manage our data protection strategy and ensure compliance with the Nigerian Data Protection Act, 2023 requirements.

The DPO is an experienced professional with in-depth knowledge of data privacy and protection principles, as well as a comprehensive understanding of the provisions of the Nigerian Data Protection Act, 2023, and any other applicable data protection laws. The DPO is responsible for monitoring our data protection policies and practices, identifying areas for improvement, and making necessary changes to ensure that we are compliant with the Data Protection Act, 2023.

Our DPO will serve as the main point of contact for any queries or concerns you may have regarding our data protection practices.

11. Training: Employee Education on Data Protection

At Paay, we prioritize the education of our employees on data privacy and protection. Our commitment is to ensure that our team possesses the necessary knowledge, skills,

and competence required to effectively navigate the compliance framework outlined in our data protection policy and the Nigerian Data Protection Act, 2023, as it pertains to safeguarding Personal Information.

Additionally, we have established an ongoing capacity-building program for our employees in data privacy and protection, aligning with the Nigerian Data Protection Act, 2023, and the General Data Protection Regulation (GDPR). This program is regularly reviewed and updated to keep our staff equipped with the latest best practices and techniques for ensuring the security and confidentiality of Personal Information.

12. Data Protection Audit: Our Internal Audit Procedures for Data Protection

At Paay, operated by Corbane Digital Tech Ltd, we conduct an annual review of our data protection policies and procedures through a licensed Data Protection Compliance Organization (DPCO). This rigorous process ensures our compliance with the Nigerian Data Protection Act, 2023, and other relevant data protection laws. The DPCO prepares a certified audit report, which is submitted to appropriate regulatory bodies, such as the National Information Technology Development Agency (NITDA), in accordance with the Nigerian Data Protection Act, 2023, and the Nigerian Data Protection Commission. This practice enables us to pinpoint areas where improvements are needed and take necessary actions to maintain compliance with data protection regulations.

13. Dispute Resolution and Complaints: How to Address Concerns and Lodge Complaints

If you have any concerns or grievances related to this Privacy Policy, please feel free to contact us at (insert email). Our dedicated team will promptly investigate and address the matter in accordance with the guidelines outlined in this Privacy Policy and the relevant data protection legislation in your region. Rest assured, our commitment is to achieve amicable resolutions for any complaints or disputes that may arise concerning the use and disclosure of personal information. We aim to resolve these concerns within a reasonable timeframe, typically not exceeding thirty (30) days from the date of receipt.

14. Your Consent

Periodically, "Paay," operated by "Corbane Digital Tech Ltd," may update or revise this Privacy Policy to reflect changes in our services or to ensure compliance with

applicable data protection laws in your jurisdiction. Such updates or changes will be posted on this page. In cases where material changes may impact you, we will notify you of these changes through online notices or via email. By continuing to use our services, you are considered to have accepted any updated Privacy Policy.