

PRIVACY POLICY

Effective Date: January 1, 2026

OJÁ-ẸWÀ INNOVATION LTD ("Ojá-Ẹwà," "we," "us," or "our") is committed to protecting your privacy. This Privacy Policy ("Policy") describes how we collect, use, disclose, and safeguard your personal information when you access or use our mobile application (the "App"), website (www.ojaewa.com), and related services (collectively, the "Services"). This Policy complies with the Nigeria Data Protection Act 2023, the General Data Protection Regulation (GDPR) for European users, and other applicable data protection laws across Africa.

1. INFORMATION WE COLLECT

1.1 Personal Information You Provide

- Account Information: Name, email address, phone number, password, profile picture, and biographical information.
- Payment Information: Bank account details, mobile money information, credit/debit card numbers (processed through secure third-party payment processors).
- Content: Product listings, descriptions, images, reviews, messages between buyers and sellers, and other user-generated content.
- Communication Data: Correspondence with us, including support requests and feedback.
- Seller Business Information: Business registration details, tax identification numbers, and artisan certification documents.

1.2 Information Collected Automatically

- Device Information: IP address, device type, operating system, unique device identifiers, mobile network information.
- Usage Data: Pages viewed, features used, time spent, clickstream data, search queries, and browsing patterns.
- Location Data: Precise or approximate location (with your consent) to facilitate local transactions and delivery.
- AI Interaction Data: Responses to Style DNA quizzes, visual search queries, interactions with Cultural Context AI Assistant, and personalization preferences.

1.3 Information from Third Parties

- Social Media Platforms: When you connect your social media accounts.
- Payment Processors: Transaction confirmation and limited payment information.
- Analytics Providers: Usage data and demographic information.
- Government Verification Services: For seller authentication and KYC compliance.

2. HOW WE USE YOUR INFORMATION

2.1 To Provide and Maintain Services

- Create and manage your account
- Process transactions and facilitate payments
- Enable communication between buyers and sellers
- Operate and improve AI features (Product Photography Enhancement, Smart Descriptions, StyleDNA, etc.)
- Provide customer support

2.2 For Personalization and AI Functionality

- Generate personalized product recommendations
- Optimize pricing suggestions for sellers
- Enhance product images using AI
- Provide cultural context and information through AI Assistant
- Predict inventory needs and market trends

2.3 For Legal and Security Purposes

- Verify identity and prevent fraud
- Comply with legal obligations and regulatory requirements
- Enforce our Terms of Service
- Protect the rights, property, or safety of Ojá-Ẹwà, our users, or the public

2.4 For Business Operations and Improvement

- Analyze usage patterns to improve Services
- Develop new features and functionality
- Conduct research and analysis
- Send service-related announcements

3. LEGAL BASIS FOR PROCESSING (GDPR COMPLIANCE)

For users in the European Economic Area, we process your personal information based on:

- Performance of Contract: To fulfill our obligations under our Terms of Service.
- Legitimate Interests: To improve our Services, prevent fraud, and market our products.
- Consent: Where required by law, particularly for sensitive data or specific marketing communications.
- Legal Obligation: To comply with applicable laws and regulations.

4. HOW WE SHARE YOUR INFORMATION

4.1 With Your Consent

When you explicitly consent to share information for specific purposes.

4.2 With Other Users

- Buyer information shared with sellers to complete transactions
- Seller information displayed on product listings

- Reviews and ratings visible to the community

4.3 With Service Providers

- Payment processors (Google Pay, Apple Pay, Interswitch, Flutterwave, Paystack, etc.)
- Cloud hosting and infrastructure providers
- AI technology partners (data processing for personalization)
- Logistics and delivery companies
- Customer support platforms

4.4 For Legal Requirements

- When required by law, court order, or government request
- To protect against legal liability
- To investigate potential violations of our policies

4.5 Business Transfers

In connection with a merger, acquisition, or sale of assets.

5. DATA RETENTION

We retain personal information only as long as necessary for:

- Providing Services to you
- Compliance with legal obligations (e.g., tax, accounting requirements)
- Resolving disputes and enforcing agreements
- Legitimate business purposes

Typical retention periods:

- Account data: While account is active + 5 years after deactivation
- Transaction records: 7 years for tax and compliance
- AI training data: Anonymized after 3 years
- Inactive accounts: Deleted after 24 months of inactivity

6. DATA SECURITY

We implement appropriate technical and organizational measures including:

- Encryption of data in transit and at rest (AES-256)
- Regular security assessments and penetration testing
- Access controls and authentication protocols
- Secure development practices for AI systems
- Employee training on data protection
- Incident response procedures

However, no electronic transmission or storage is 100% secure. We cannot guarantee absolute security.

7. AI AND AUTOMATED DECISION-MAKING

7.1 AI Features

Our Services utilize artificial intelligence and machine learning for:

- Product recommendations and personalization
- Pricing optimization
- Image enhancement
- Trend prediction
- Content generation

7.2 Your Rights Regarding AI

You have the right to:

- Request human intervention in automated decisions
- Challenge decisions made solely by automated means
- Understand the logic involved in AI-driven personalization
- Opt-out of certain AI processing where feasible

7.3 AI Training Data

We may use anonymized, aggregated user data to train and improve our AI models. Personal identifiers are removed before training.

8. INTERNATIONAL DATA TRANSFERS

As an African-focused platform with global users, your data may be transferred to and processed in countries outside your residence. We ensure adequate safeguards through:

- Standard Contractual Clauses (EU transfers)
- Adequacy decisions where applicable
- Binding corporate rules for intra-group transfers
- Explicit consent when required

9. YOUR DATA PROTECTION RIGHTS

Depending on your location, you may have the following rights:

9.1 Access and Portability

- Request copies of your personal information
- Receive information in a structured, commonly used format

9.2 Correction and Deletion

- Request correction of inaccurate or incomplete data
- Request deletion of your personal information

9.3 Restriction and Objection

- Request restriction of processing under certain conditions
- Object to processing based on legitimate interests

9.4 Marketing Preferences

- Opt-out of marketing communications
- Adjust notification settings in your account

9.5 Withdraw Consent

Withdraw consent at any time where processing is based on consent.

9.6 Complaints

Lodge complaints with your local data protection authority.

10. CHILDREN'S PRIVACY

Our Services are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware of such collection, we will take steps to delete it.

11. COOKIES AND TRACKING TECHNOLOGIES

We use cookies, pixel tags, and similar technologies to:

- Remember preferences and settings
- Analyze usage patterns
- Deliver personalized content
- Measure advertising effectiveness

You can control cookies through browser settings, though this may affect functionality.

12. THIRD-PARTY LINKS AND SERVICES

Our Services may contain links to third-party websites or services. This Policy does not apply to third-party practices. We encourage you to review their privacy policies.

13. CHANGES TO THIS POLICY

We may update this Policy periodically. We will notify you of material changes through:

- In-app notifications
- Email communication
- Updated "Effective Date" at the top of this Policy

Your continued use after changes constitutes acceptance of the revised Policy.

15. CONTACT US

For questions, concerns, or to exercise your rights:

Email: support@ojaewa.com

ACKNOWLEDGEMENT

BY USING OUR SERVICES, YOU ACKNOWLEDGE THAT YOU HAVE READ AND UNDERSTOOD THIS PRIVACY POLICY AND CONSENT TO THE COLLECTION, USE, AND DISCLOSURE OF YOUR PERSONAL INFORMATION AS DESCRIBED HEREIN.

This document was drafted in compliance with the Nigeria Data Protection Act 2023 and incorporates principles from the GDPR, African Union Convention on Cyber Security and Personal Data Protection, and other applicable regional frameworks.