

# Privacy Policy

Effective Date: 3rd June 2025

## 1. Introduction

Balancc ("we," "our," or "us") is committed to protecting the privacy and security of your personal data. This Privacy Policy describes how we collect, use, store, share, and protect your information when you use our mobile application, website, and related services (the "Services").

This Policy complies with:

- Nigeria Data Protection Regulation (NDPR 2019)
- General Data Protection Regulation (GDPR 2016/679) of the European Union
- California Consumer Privacy Act (CCPA) for US-based users where applicable

By using Balancc, you consent to the data practices outlined herein.

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## 2. Information We Collect

### 2.1 Personal Information

- Full name
- Email address
- Phone number
- Bank account identifiers (through secure APIs)
- Transactional and financial data
- Identity verification data (if applicable)

### 2.2 Technical Data

- Device information and IP address
- App usage logs and analytics
- Authentication tokens

### 2.3 Optional Data (with explicit consent)

- Location data
  - Contacts (for referrals or financial network mapping)
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## 3. Legal Basis for Processing

We collect and process your data under the following legal bases:

- Consent (NDPR Part 2.1(a), GDPR Art. 6(1)(a))
  - Performance of a contract (NDPR Part 2.1(b), GDPR Art. 6(1)(b))
  - Compliance with legal obligations (NDPR Part 2.1(c), GDPR Art. 6(1)(c))
  - Legitimate interests, provided they do not override your rights (NDPR Part 2.1(f), GDPR Art. 6(1)(f))
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#### **4. How We Use Your Information**

Your information is used to:

- Provide, maintain, and improve Balancc Services
- Link and analyze financial accounts
- Deliver insights on spending, income, and cash flow
- Detect anomalies or unauthorized activities
- Communicate service updates and personalized content (opt-out supported)

We do not sell or lease your personal data to third parties.

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#### **5. Sharing of Data**

We only share your information:

- With trusted third-party service providers (under NDA and data agreements)
- With regulators or law enforcement when legally required
- With partners or affiliates, only with your explicit consent
- In business transfers such as mergers or acquisitions

All third parties must comply with NDPR/GDPR-compliant data processing standards.

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#### **6. International Transfers**

We may store and process data outside Nigeria. In such cases, we:

- Ensure data transfer agreements contain standard contractual clauses (GDPR Art. 46)
  - Verify that the receiving country offers adequate data protection
  - Remain the data controller as defined by NDPR Section 2.1(x)
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## 7. Data Retention

We retain personal data only as long as necessary:

- For the purposes set out in this policy
- To comply with legal, regulatory, or operational requirements

Once no longer required, data is securely deleted or anonymized.

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## 8. Your Rights

You have the right to:

- Access your data (NDPR Sec. 3.1(7))
- Correct inaccurate information
- Request deletion of your account and data ("right to be forgotten")
- Withdraw consent at any time
- Object to data profiling or direct marketing

To exercise these rights, email: **privacy@balancc.app**

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## 9. Data Security

We employ:

- End-to-end encryption
- Secure OAuth/tokenized API authentication
- Firewalled cloud environments
- Access controls and audit logging

Security is designed in accordance with NDPR Sec. 2.6 and GDPR Art. 32.

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## 10. Children's Data

Balancc is not intended for users under 18. We do not knowingly collect data from minors.

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## 11. Changes to this Policy

We may revise this Privacy Policy. Users will be notified of material changes via email or in-app notices.

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## 12. Contact Information

Balancc Privacy Compliance Team

Email: **privacy@balancc.app**

Address: [Insert Registered Business Address]

Data Protection Officer (DPO): [Insert if applicable]

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## 13. Additional Jurisdictional Notices

### Nigeria:

- This policy adheres to NDPR 2019 issued by NITDA
- You may report unresolved complaints to: **dpo@nitda.gov.ng**

### EU/EEA:

- Our representative under GDPR Art. 27 is: [Insert Representative Info if required]

### USA (California):

- You have the right to request a copy of the data collected about you in the last 12 months
  - You can opt-out of "sale" of personal data under the CCPA (we do not sell data)
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## 14. Version Control Version: 1.0

Last Updated: 3rd June, 2025

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