### **Our Privacy Policy**

**PRIVACY POLICY- ELLAMEDIATE**

This privacy policy (this "Privacy Policy") explains how personal information is collected, used, stored, and disclosed by Ellamediate (“Ellamediate Limited,” “Ellamediate LLC,” “Ellamediate," "We," "Us," and "Our"). The provisions contained in this Privacy Policy supersede all previous notices and statements regarding our privacy practices with respect to our services.

**Application of this Privacy Policy**

* This Privacy Policy applies generally to the business of Ellamediate and serves to set out our approach to personal data, inclusive of personal data of our consumer users ("Users").
* This Privacy Policy applies to systems, operations and processes of Ellamediate that involve the collection, use, storage, and disclosure etc. of personal information.
* This Privacy Policy applies to use of our websites, applications, other online services and/or any related services, sales, marketing, promotional or events, and social media activities (collectively, our "Services").
* For our Users, this Privacy Policy is part of our Terms of Use.
* This Privacy Policy applies to your use of (regardless of means of access) our Services. You may access or use our Services through a desktop, laptop, mobile phone, tablet, or other consumer electronic device (each, a "Device").
* This Privacy Policy also applies to offline interactions with Ellamediate.

By accessing or using our Services, you agree to this Privacy Policy.

**Our Use of Your Information**

When you join us, you provide us with your contact information, including your email addresses. We use this information to send you updates about your order, questionnaires to measure your satisfaction with our service and announcements about new and exciting services that we offer. When you make payments through our platforms, we request for your card details and billing address. We use this information only to bill you for the payments you make at the time. For your convenience, your billing information may be retained for payments.

We occasionally hire other companies to provide limited services on our behalf, including answering customer’s questions about our products and services. We would only provide those companies the information they need to deliver the services and they are prohibited from using that information for any other purposes.

The company will disclose your personal information without notice, only if required to do so by law or in good faith and belief that such action is necessary to:

1. conform to the law, or comply with legal processes served on the company or the site.
2. protect and defend the rights or property of the company and its website.
3. act in urgent circumstances to protect the personal safety of users of the company, its websites or the public.

**Information We Collect**

The information we collect is the information you provide us.

In general, you can visit [https://www.ellamediate.com](https://www.ellamediate.com/) without telling us who you are or revealing any information about yourself.

When you submit an inquiry to us via any means, register for a Ellamediate Account, register to attend a Ellamediate event, interact with us on social media and volunteer information to us; we may collect personal information from you, which may include your name, email address, mobile phone number, digital signature, banking information, image and other information that identifies you (collectively, "Personal Information"). By providing your Personal Information to us, you expressly agree to our collection, use, storage, and disclosure of such information as described in this Privacy Policy.

As a User, we will also ask you to create login information for your Ellamediate Account, such as a username and password. When you provide your mobile phone number, we may ask for your consent to receive text messages relating to our Services on that number.

In general, we collect Personal Information you give us during on boarding and by filling in forms or by corresponding with us by phone, email, social media posts & messages, or otherwise.

**Information About Your Transactions**

We collect Personal Information about your transactions with us and others.

**Information from Third Parties**

We also collect Personal Information about you from other companies. For instance, we may receive Personal Information about you from a consumer reporting agency or we may collect Personal Information from your employer where your employer is providing a service to Ellamediate.

We may collect your Personal Information from a User where your Personal Information is filled in a Next-of-Kin form.

**Customer Profiles:**

Every customer has a unique personal identification profile. Each profile is assigned a unique personal identification number, which helps us ensure that only you can access your profile.

When you register, we create your profile, assign a personal identification number, then send this personal identification number back to your hard drive in the form of a cookie, which is a very small bit of code. This code is uniquely yours. It is your passport to seamless travel across the website.

**Information Automatically Collected**

We (or our service providers acting on our behalf) may collect information about your use of our Services. This information may include Personal Information as well as statistical information that does not identify you ("Analytics"). Some Analytics may be correlated with Personal Information. When Analytics are, directly or indirectly, associated or combined with Personal Information, such Analytics will be considered Personal Information for purposes of this Privacy Policy.

Information that we automatically collect in connection with your access or use of our Services may include:

Device Information: We may collect Device-specific information (such as hardware model, operating system version, unique Device identifiers, and mobile network Information, including your mobile phone number). We may associate your Device identifiers or mobile phone number with your Ellamediate account.

Log Information: We may record or log information from your Devices, their software, and your activity accessing or using our Services. This information may include:

* The Device's Internet Protocol ("IP") address
* Identification numbers associated with your Devices
* Device event information, such as crashes, system activity, and hardware settings
* Location preferences
* Date and time stamps of transactions
* System configuration information
* Other interactions with our Services

**Information Collected Through Cookies and Similar Technologies**

We use cookies to personalise our Services for you and to collect aggregate information about the usage of our Services. A cookie is a text file or other local storage identifier provided by your browser or associated applications. We use cookies for record-keeping purposes and to enhance the quality of your use of our Services. The cookies assign random, unique numbers to your Devices to enable our systems to recognise your Devices and to allow us to see how you use our Services. Additional general information about cookies and how they work is available at www.allaboutcookies.org.

The cookies we use in connection with our Services include:

**Session cookies:** Session cookies are temporary cookies that expire and are automatically erased whenever you close your browser window. We use session cookies to grant users access to content and to enable actions they must be logged into their Ellamediate account to perform.

**Persistent cookies:** Persistent cookies usually have an expiration date in the distant future and remain in your browser until they expire or you manually delete them. We use persistent cookies to better understand usage patterns so we can improve our Services. For example, we may use a persistent cookie to associate you with your Ellamediate account or to remember your choices for our Services.

**Third-party cookies:** We permit certain third parties to place cookies through our Services to provide us with better insights into the use of our Services and user demographics and to advertise our Services to you. These third parties may collect information about your online activities over time and across different websites when you access or use our Services. For example, we utilize Google Analytics to analyse usage patterns for our Services. Google Analytics generates a cookie to capture information about your use of our Services, which Google uses to compile reports on website activity for us and to provide other related services. Google may use a portion of your IP address to identify its cookie, but this will not be associated with any other data held by Google. We may also permit third-party service providers to place cookies for our Services, as indicated above, to perform analytic or marketing functions where you are notified of them and you have consented to the usage. We do not control the use of such third-party cookies or the resulting information, and we are not responsible for any actions or policies of such third parties. By accessing or using our Services, you consent to the placement of cookies on your Devices as described in this Privacy Policy. If you prefer not to receive cookies through our Services, you may control how your browser responds to cookies by adjusting the privacy and security settings of your web browser. Unless you set your browser settings to refuse all cookies, our system may issue cookies when you access or use our Services. If you set your browser settings to refuse all cookies, the performance of certain features of our Services may be limited or not work at all.

**Do-Not-Track Signals**

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 use technology that recognizes DNT signals from your web browser.

**How We Use Information**

We may use Analytics as described elsewhere in this Privacy Policy and for research and commercial purposes, such as to improve our Services.

We may use Personal Information for the purposes described elsewhere in this Privacy Policy and internally for our general commercial purposes, including, among other things, to offer our products and services and products and services of third parties that we think you might find of interest. Only Ellamediate and our third-party service providers involved in distributing the offers or providing the products or services will have access to your Personal Information. Our third-party service providers will only be permitted to use Personal Information for that intended purpose.

We may use your email address to respond to your inquiries and to provide information about our Services. You may elect not to receive promotional emails from us either by "unsubscribing" to an email you receive from us or by contacting us as indicated below. As a User, if you unsubscribe from receiving emails from us, we may still send you non-promotional emails, such as emails about your Ellamediate account or our ongoing business relations, unless you withdraw your consent to receive electronic communications as provided in our Terms of Use.

**How We Share Information**

We do not share your Personal Information with:

1. Other financial companies for joint marketing purposes;
2. Affiliated companies for their everyday business purposes; or
3. Any third parties so they can market to you.

We may share your Personal Information with unaffiliated third parties:

1. If the information is provided to: (a) comply with applicable laws, rules, regulations, governmental and quasi-governmental requests, court orders, or subpoenas; (b) enforce our Terms of Use or other agreements; or (c) protect our rights, property, or safety or the rights, property, or safety of our users or others (e.g., to a consumer reporting agency for fraud protection, etc.);
2. As permitted by applicable law or otherwise described in this Privacy Policy.

**Opt-Out Rights**

If you do not wish to receive offers or other notices from us in the future, you can "opt-out" by contacting us as indicated at the end of this Privacy Policy or by following the "unsubscribe" instructions in any communication you receive from us. Please be aware that if you are a User, you are not able to opt-out of receiving communications about your Ellamediate account or related transactions with us.

**Other Rights to Your Personal Information with Us**

Beyond your right to opt out of our processing Personal Information, you also have the option of exercising any of the below rights with respect to your Personal Information:

* **Request Correction to your Personal Information**

We will automatically use the pre-stored date received from you during the KYC process. Hence, you are required to provide accurate, truthful, current and valid information during your on-boarding process. We respect your wishes to correct inaccurate information and as such you must notify us promptly, of any change in your Personal Information. Changes to financial details will also require you to contact us directly. We may need to verify the accuracy of the new data you provide to us.

* **Request Access to your Personal Information**

You can ask us whether we are storing your Personal Information and you can ask to receive a copy of that Personal Information. Before sending you any Personal Information, we will ask you to provide proof of your identity. If you are not able to provide proof of your identity, we reserve the right to refuse to send you any Personal Information. We will respond as quickly as we can to your requests for details of Personal Information, we hold about you.

* **Request us to refrain from doing certain things with your data or restrict the extent of our collection or processing of your data**You may object the processing of your personal data where you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
* **Request partial or complete erasure of your Personal Information**You may request for us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note however that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
* **Request the transfer of your Personal Information to another party**
* **Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you**

**Information You Share Socially**

Our Services may allow you to connect and share your actions, comments, content, and information publicly or with friends. We are not responsible for maintaining the confidentiality of any information you share publicly or with friends.

Our Services may also allow you to connect with us on, share on, and use third-party websites, applications, and services. Please be mindful of your personal privacy needs and the privacy needs of others, as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. We also do not control the privacy practices of third parties. Please contact those sites and services directly if you want to learn about their privacy practices.

**Security and Storage of your Personal Information**

We have suitable security measures in place to prevent your Personal Information from being accidentally lost or used or accessed in an unauthorised way by a third party. When your bank account information is transmitted via our Services, it will be protected by encryption Technology-Super Secured Firewalls, such as Secure Sockets Layer (SSL). In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We have, and require our third-party service providers that receive Personal Information from us to have, a comprehensive written information security program that contains administrative, technical, and physical safeguards for our respective physical facilities and in our respective computer systems, databases, and communications networks that are reasonably designed to protect information contained within such systems from loss, misuse, or alteration

No method of electronic transmission or storage is 100% secure. Therefore, we cannot guarantee absolute security of your Personal Information. You also play a role in protecting your Personal Information. Please safeguard your username and password for your Ellamediate Account and do not share them with others. If we receive instructions using your Ellamediate account login information, we will consider that you have authorized the instructions. You agree to notify us immediately of any unauthorized use of your Ellamediate account or any other breach of security. We reserve the right, in our sole discretion, to refuse to provide our Services, terminate Ellamediate accounts, and to remove or edit content.

Subject to applicable law, which might, from time to time, oblige us to store your Personal Information for a certain period of time, we will retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting, or reporting requirements.

**Protecting Children’s Privacy**

Our Services are not directed or intended to be attractive, to children under the age of 18. We do not knowingly collect Personal Information from children under the age of 18. If you are under the age of 18, do not use our Services or submit any information to us.

**Changes to our Privacy Policy**

Subject to the applicable law, we may revise this Privacy Policy at any time and in our sole discretion. When we revise this Privacy Policy, we will post the revised version via our Services and will update the date at the top of this Privacy Policy. The revised Privacy Policy will be effective upon posting via our Services, unless otherwise set forth therein or as otherwise required by applicable law. You are free to decide whether or not to accept a revised version of this Privacy Policy, but accepting this Privacy Policy, as revised, is required for you to continue accessing or using our Services. If you do not agree to the terms of this Privacy Policy or any revised version of this Privacy Policy, your sole recourse is to terminate your access and use of our Services. Except as otherwise expressly stated by us, your access and use of our Services are subject to the version of this Privacy Policy in effect at the time of access or use.

**How can I contact Ellamediate?**

If you have any questions, comments, or concerns regarding these Terms or the Services, please contact us at (+234) 8084253962 **(Nigeria)**, +1 307 6831180 **(United States),** +44 20 80896090 **(United Kingdom) or** email us at hi@ellamediate.com.

**Applicable Data protection law**

**The law governing this privacy policy is limited to the data protection law of the place where we are registered or conduct substantial business activities related to the transaction in question (whichever one is more appropriate).**