

TRANVERSE BUSINESS SOLUTIONS LIMITED PRIVACY POLICY

This Privacy Policy covers our practices concerning the collection, use and disclosure of your personal information when you visit <https://www.traverse.com.ng/> (this “Site”), as well as our product site at <https://www.myproparty.com.ng/>. It describes how we gather and use your data as you access or interact with us through our Sites.

1.0 PERSONAL INFORMATION WE COLLECT

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as “Device Information.”

1.1 We collect Device Information using the following technologies:

- “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “Web beacons,” “tags,” “event manager”, and “pixels” are electronic files used to record information about how you browse the Site.

Additionally when you make a payment or attempt to make a payment through the Site, we collect certain information from you, including your name, payment information (including credit card numbers, email address, and phone number. We refer to this information as “Payment Information.”

When we talk about “Personal Information” in this Privacy Policy, we are talking both about Device Information and Payment Information.

2.0 HOW DO WE USE YOUR PERSONAL INFORMATION

- We use the Personal Information that we collect generally to fulfill any valued service through the Site (including processing your payment information, providing you with invoices and/or payment confirmation email).
- Additionally, we use this Payment Information to: Communicate with you; Screen our orders for potential risk or fraud; and when in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.
- Determine your eligibility and analyze requests for services.
- To ensure that our platform(s) are kept safe from fraudulent and criminal activity.
- To add you to our list of legitimate users.
- To administer your account and profile.
- To verify your identity when you sign in.
- To keep you in the loop regarding any alterations to our services.

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

3.0 SHARING YOUR PERSONAL INFORMATION

We value your privacy and limit the sharing of your Personal Data with third parties. We will never sell, give or trade any information we have obtained from you. However, we can share your details with certain categories of third party;

a. We share your Personal Information with payment Merchants to help us use your Personal Information, as described above. For example, we use Paystack and Flutterwave to power our online payment--you can read more about how Paystack and

Flutterwave uses your Personal Information here: <https://paystack.com/terms> and <https://www.flutterwave.com/ng/privacy-policy> respectively.

b. We may need to use service providers and IT infrastructure companies to make our products and services available to you, under strict data security and protection.

c. Where there is a regulatory or statutory obligation to disclose such Personal Data in accordance with provisions of applicable laws.

d. We also use Google Analytics to help us understand how our customers use the Site-
-you can read more about how Google uses your Personal Information here: <https://www.google.com/intl/en/policies/privacy/>.

4.0 DATA SECURITY

We take the safeguarding of your information seriously and have implemented robust technologies and policies to preserve your privacy. We follow all applicable laws, particularly those related to the Information Security Management System (ISMS), and are working hard to eliminate any potential for a data privacy breach incident. Though we do our utmost to protect you, we can't guarantee absolute security when you use our site given the inherently insecure nature of the internet.

5.0 BEHAVIOURAL ADVERTISING

We use your Personal Information to provide targeted advertisements and marketing communications that we believe may be of interest to you. This method allows companies to tailor ads to fit your preferences, improving the accuracy of targeting potential customers.

6.0 DO NOT TRACK

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

7.0 YOUR RIGHTS

As a data subject, you have certain rights granted by the law, such as the right to: As a data subject, you have certain rights granted by the law, such as the right to:

- a. You can request a copy of the personal information we store about you.
- b. Make corrections to any information you think is incorrect.
- c. In particular scenarios, limit the handling of your data.
- d. You have the right to oppose us processing your data where we intend to use it for marketing.
- e. Receive all personal data you provided to us—in a structured, common, and machine-readable format—where feasible. Additionally, you can transmit this information to another data controller.
- f. You can ask for your data to be removed (also referred to as the right of erasure).
- g. Revoke your permission for the use of your personal information.
- h. If you suspect that we have contravened any of the clauses in this Privacy Policy, please direct your complaint to an appropriate authority within 30 days after discovering the breach.

You may exercise any of the aforementioned rights at any time by sending us an email at dataprotection@tranverse.com.ng. If you wish to file a complaint, it should be sent to the National Information Technology Development Agency (NITDA) at dpo@nitda.gov.ng.

8.0 DATA RETENTION

The information gathered from you will be kept for the time needed to carry out the purposes listed in this Policy. Additionally, your data may be retained in accordance with applicable laws, to resolve disputes and enforce our legal agreements and rules. It is important to recognize that your data may be held longer than requested if there is a legal requirement to do so.

9.0 HOW YOUR DATA IS STORED

We store and process your data on our database, taking all necessary measures to ensure its protection. We use a range of physical, technical, and organizational security solutions such as firewalls and encryption, along with physical access restrictions and authorization for information access.

We will contact you without hesitation in the instance of a potential or actual breach that could harm your rights and freedoms. We will do our utmost to rectify the issue within a period of one month starting from when we notify you.

10.0 MINORS

This Site is not meant for users who are younger than 13.

11.0 CHANGES

We may revise this privacy policy from time to time, to reflect changes in our practices or due to regulatory or other operational reasons.

Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

CONTACT US

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at info@tranverse.com.ng or by using the details provided below:

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