CentralMarket Privacy Policy

Effective: 12/02/2025 | NDPA Compliance Version 2.3

1. Data Controller Information

Entity: CentralMarket Limited (RC 23429)

DPO Contact: admin@centralmarket.ng

Physical Address: Obafemi Awolowo University, Ile Ife

2. Data Collection Categories

• Identity Data: BVN, NIN, Passport (Section 24 NDPA 2023)

• Transaction Data: Purchase history, bank details (CBN Guidelines)

• **Technical Data:** IP addresses, device fingerprints (NCC Directive 2024)

• **Biometric Data:** For transactions greater than ₹5,000,000 (EFCC AML Regulations)

3. Legal Basis for Processing

Purpose

Legal Basis

Fraud prevention Section 37 NDPA (Legitimate Interest) KYC compliance CBN Anti-Money Laundering Act 2022

4. Third-Party Data Sharing

- 1. NIBSS (Payment verification)
- 2. Law enforcement (Court order requirement)
- 3. Shipping partners (Limited to delivery data)

5. User Rights (NDPA Section 34)

- Right to access personal data
- Right to data portability
- Right to erasure (With exceptions per Section 35)

6. Security Protocols

Implementation of:

- ISO 27001-certified encryption
- Quarterly penetration testing
- NDPR-compliant breach notification system

Dispute Resolution

Complaints must be filed through our NDPA Portal within 30 days of incident.

Governing Law: Lagos State Data Protection Regulations 2024