

THE ANAKIN GROUP

AnakinID Terms

Identity Verification & Authentication

Effective Date: [DATE] • Version 1.0

Governing Law: Federal Republic of Nigeria • NDPR Compliant

These terms form part of and are subject to the Anakin Master Terms of Service.

Overview

These AnakinID Terms govern the identity verification and authentication layer of the Anakin ecosystem. AnakinID is the process by which Anakin confirms that you are who you say you are. It is a prerequisite for full access to the platform and is required to comply with applicable Nigerian financial regulations, including Know Your Customer (KYC) obligations.

These Terms apply to all users who submit to the AnakinID verification process and should be read alongside the Anakin Master Terms of Service and the Anakin Privacy Policy, both of which continue to apply in full.

Plain language summary: AnakinID is how Anakin verifies your identity. Nigerian users need to provide their BVN and NIN. Foreign nationals need to provide their International Passport. This is required by Nigerian regulations and keeps the platform safe for everyone. Until verification is complete, you can browse the app but all financial features and Credits are locked. Your data is used only for verification and is handled in accordance with our Privacy Policy.

1. What AnakinID Is

AnakinID is Anakin's identity verification and authentication layer. It serves two functions: it verifies your identity at onboarding to confirm you are a real, eligible person before granting access to the platform, and it provides the ongoing authentication infrastructure that protects your account from unauthorised access.

AnakinID is not a separate product. It is a foundational layer that underpins access to all Anakin services. Without a completed and approved AnakinID verification, full access to AnakinPay, Anakin Credits, and the broader ecosystem is not available.

2. Why Verification Is Required

Anakin is required under Nigerian law and regulation to verify the identity of every user who accesses financial services on the platform. This requirement arises from:

- The Central Bank of Nigeria's Know Your Customer (KYC) guidelines, which require financial service providers to verify the identity of customers before providing services.
- Anti-money laundering (AML) and counter-terrorism financing (CTF) obligations, which require Anakin to ensure the platform is not used to facilitate illegal financial activity.

- The Nigeria Data Protection Regulation (NDPR) 2019 and Nigeria Data Protection Act (NDPA) 2023, which govern how identity data collected during verification must be handled.

Verification is not optional. It is a legal obligation on Anakin's part, and a condition of access on yours. By submitting to the AnakinID process, you acknowledge this requirement and consent to the collection and processing of your verification data as described in these Terms and in the Anakin Privacy Policy.

3. What Verification Requires

To complete AnakinID verification, you are required to provide the following. Requirements differ slightly for Nigerian nationals and foreign nationals, as set out below:

3.1 Bank Verification Number (BVN)

Your BVN is a unique identifier issued by the Central Bank of Nigeria that links to your biometric and financial identity. You must provide your BVN as part of the AnakinID process. Your BVN is validated through authorised channels and is used solely to confirm your identity. It is not used for any other purpose and is not shared with any third party except as required by law or as necessary to complete the validation process through a licensed verification provider.

By providing your BVN, you confirm that it is your own BVN and that you are authorised to use it. Providing a false, borrowed, or stolen BVN constitutes fraud and will result in immediate account termination and may be reported to the relevant authorities.

3.2 Government-Issued Identification

In addition to your BVN, you are required to provide a valid government-issued identity document. The accepted document depends on your nationality:

- Nigerian Nationals: National Identification Number (NIN) slip or card
- Foreign Nationals: Valid International Passport issued by your country of nationality
- Driver's Licence
- Permanent Voter's Card

3.3 Document Requirements

All identity documents submitted must be current, undamaged, and legible. Documents must belong to you and must be consistent with the information provided during registration. Anakin reserves the right to reject documents that are expired, altered, or inconsistent with other submitted information.

Where a document is submitted in a language other than English, Anakin reserves the right to request a certified translation before completing verification.

4. The Verification Process

4.1 Submission

You submit your verification materials through the Anakin app during the onboarding process. The app will guide you through each step in sequence. All submissions must be made by you personally. You may not submit verification materials on behalf of another person, and no third party may submit on your behalf.

4.2 Review and Outcome

Anakin reviews your submitted materials against the information provided during registration and against the results returned by our authorised verification providers. Verification outcomes are typically returned within a short time. Where additional review is required, we will notify you and provide an estimated timeframe.

Possible outcomes of the verification process are:

- Approved — your identity has been successfully verified and full access to the platform is granted.
- Pending — your submission is under review. Limited access may be available during this period.
- Requires resubmission — one or more elements of your submission were unclear, expired, or inconsistent. You will be prompted to resubmit the affected element.
- Declined — your identity could not be verified. Reasons for decline will be communicated to you to the extent permitted by law. You may have the right to appeal as described in Section 5.

4.3 Accuracy of Information

You are responsible for ensuring that all information and materials submitted during the AnakinID process are accurate, genuine, and belong to you. Anakin is not responsible for delays or declines arising from inaccurate, inconsistent, or fraudulent submissions.

5. Access During and After Verification

5.1 Partial Access Before Verification

Users who have not yet completed AnakinID verification, or whose verification is pending or incomplete, may browse the Anakin app interface freely. However, all financial and Credits systems are locked and restricted until verification is approved. This means you cannot fund your Wallet, make purchases, accrue or apply Credits, or access Credits Advance until your AnakinID status is confirmed as approved. This restriction exists to protect both you and the integrity of the platform.

5.2 Full Access Upon Approval

Upon successful completion of the AnakinID verification process, full access to the Anakin ecosystem is granted in accordance with your membership tier. Access is subject to these Terms, the Master Terms of Service, and any product-specific terms applicable to the features you use.

5.3 Verification Failure

If your AnakinID verification is declined and cannot be resolved through resubmission, your account will remain in a restricted state. You will not be able to access financial features of the platform. You may contact our support team to understand the reason for the decline and, where applicable, to initiate an appeal. Anakin reserves the right to decline verification where required by law or where there is a reasonable basis to suspect fraud or identity misrepresentation.

6. Re-Verification

Anakin may require you to complete re-verification in the following circumstances:

- Suspicious or unusual activity is detected on your account that warrants identity re-confirmation.
- You attempt to access your account from a new or unrecognised device and additional authentication is required.
- A material change to your account information — such as a registered phone number or name update — requires identity re-confirmation.
- A regulatory requirement or internal policy change necessitates updated verification for existing users.

Where re-verification is required, you will be notified through the app and given a reasonable period to complete it. During this period, your access to certain features may be temporarily

restricted. If re-verification is not completed within the timeframe specified, your account may be suspended until it is resolved.

Re-verification follows the same process described in Section 3 and Section 4. Materials submitted during re-verification are handled in the same way as original verification materials.

7. Data Handling

7.1 What We Collect and Why

During the AnakinID process, Anakin collects your BVN, government-issued identity document details, and selfie image. This data is collected for the sole purpose of verifying your identity and fulfilling Anakin's regulatory obligations. It is not used for marketing, profiling, or any purpose beyond identity verification and account security.

7.2 BVN Handling

Your BVN is transmitted to an authorised third-party identity verification provider for validation. It is not stored in plain text within Anakin's systems beyond what is required for the verification process. The verification provider processes your BVN solely to return a verification result and is contractually prohibited from retaining or using it for any other purpose.

7.3 Document Handling

Your identity document is processed to confirm authenticity and match the information you provided during registration. Document images are retained for the minimum period required by law and in accordance with the retention schedule set out in the Anakin Privacy Policy.

7.4 Retention

Identity verification data is retained for the duration of your account and for a minimum of five (5) years following account closure, in accordance with Nigerian financial record-keeping requirements. After the applicable retention period, data is securely deleted or anonymised.

7.5 Your Rights

Your data subject rights in relation to AnakinID data are the same as those described in the Anakin Privacy Policy. Where the exercise of a data subject right — such as erasure — would conflict with a legal retention obligation, the legal obligation takes precedence and we will explain this to you clearly.

8. Accuracy and Fraud

The integrity of the AnakinID process depends on users submitting genuine, accurate, and personal materials. The following constitute serious violations of these Terms and of applicable Nigerian law:

- Submitting a BVN, identity document, or selfie that does not belong to you.
- Submitting altered, forged, or fraudulently obtained identity materials.
- Assisting another person to circumvent the verification process.
- Creating multiple accounts to evade a verification decline or account restriction.

Where Anakin identifies or reasonably suspects any of the above, the account will be immediately suspended and the matter may be referred to the Nigeria Financial Intelligence Unit (NFIU), the Economic and Financial Crimes Commission (EFCC), or other relevant authorities. Anakin cooperates fully with law enforcement in matters of identity fraud.

9. Third-Party Verification Providers

Anakin uses licensed third-party identity verification providers to validate BVN and document authenticity. These providers operate under contracts that require them to process your data only as instructed by Anakin, to maintain appropriate security standards, and to refrain from using your data for any purpose of their own.

The use of third-party providers does not diminish Anakin's responsibility for your data. Anakin remains the data controller and is accountable for ensuring that your information is handled appropriately throughout the verification process.

10. Changes to These Terms

Anakin may update these AnakinID Terms from time to time, including to reflect changes in regulatory requirements, verification technology, or platform policy. Material changes will be communicated to you through the app or your registered contact details with reasonable advance notice. Your continued use of the platform after the effective date of any update constitutes your acceptance of the revised Terms.

11. Governing Law

These AnakinID Terms are governed by the laws of the Federal Republic of Nigeria. Any dispute arising under or in connection with these Terms shall be resolved in accordance with the dispute resolution provisions in the Anakin Master Terms of Service.

12. Contact

For questions about the AnakinID process, your verification status, or these Terms, contact us at:

The Anakin Group

Abuja, Nigeria

support@thetheanakin.com

thetheanakin.com

End of AnakinID Terms — Version 1.0