

THE ANAKIN GROUP

Privacy Policy

Effective Date: [DATE] • Version 1.0
Governing Law: Federal Republic of Nigeria • NDPR Compliant

Our Commitment to Your Privacy

The Anakin Group (“Anakin”, “we”, “us”, or “our”) is committed to protecting the personal information of every person who interacts with our platform. This Privacy Policy explains what data we collect, why we collect it, how we use and protect it, and what rights you have in relation to it.

This Policy applies to all products and services within the Anakin ecosystem, including AnakinPay, Anakin Network, AnakinID, and the Anakin Credits system. It applies whether you access our services through the Anakin mobile application, website, or any other interface we operate.

This Policy is issued in compliance with the Nigeria Data Protection Regulation (NDPR) 2019 and the Nigeria Data Protection Act (NDPA) 2023. By using any Anakin service, you acknowledge that you have read and understood this Policy.

1. Who Controls Your Data

The data controller responsible for your personal information is:

The Anakin Group

Abuja, Nigeria

privacy@thetheanakin.com

thetheanakin.com

As data controller, we determine the purposes and means by which your personal data is processed. Where we engage third-party service providers to process data on our behalf, they do so as data processors acting under our instruction and are bound by confidentiality and data protection obligations consistent with this Policy.

2. Data We Collect

We collect personal data across three categories: data you provide directly, data generated by your use of our services, and data obtained from authorised third parties to verify your identity.

2.1 Data You Provide

- Full legal name
- Date of birth
- Phone number and email address
- Bank Verification Number (BVN) — collected solely for identity verification purposes via AnakinID
- Government-issued identification document details
- Residential address
- Profile photograph or selfie image, where required for verification
- Business information, where you register as a merchant on Anakin Network

2.2 Data Generated by Your Use of Our Services

- Transaction records, including amounts, timestamps, merchant details, and Credits applied
- Wallet funding history and internal ledger activity
- Membership tier status and progression history
- Credits balance, accrual activity, and Credits Advance utilisation
- Device information, including device type, operating system, and unique device identifiers
- App usage data, including features accessed, session duration, and interaction patterns
- IP address and approximate location data derived from network access

2.3 Data from Authorised Third Parties

- Identity verification data returned from BVN validation services
- Fraud risk signals or sanctions screening results from licensed verification providers

We do not collect sensitive personal data beyond what is strictly necessary for identity verification and regulatory compliance. We do not collect biometric data in the form of fingerprints or facial geometry; any selfie images collected are used for liveness verification during onboarding and are not stored as biometric templates.

3. Why We Collect Your Data

We process your personal data only where we have a lawful basis to do so under the GDPR and NDPA. The purposes for which we process data, and the corresponding lawful basis for each, are set out below.

3.1 To Provide Our Services — Contractual Necessity

- Creating and managing your Anakin account
- Processing wallet funding, internal ledger transactions, and Credits redemptions
- Administering Credits Advance, including eligibility determination and recoupment
- Enabling merchants on Anakin Network to receive settlement
- Communicating with you about your account, transactions, and service updates

3.2 To Verify Your Identity — Legal Obligation

- Conducting Know Your Customer (KYC) checks as required under Nigerian financial regulations
- Validating your BVN through authorised channels
- Complying with anti-money laundering (AML) and counter-terrorism financing (CTF) obligations

3.3 To Protect Our Services — Legitimate Interest

- Detecting, preventing, and investigating fraud, abuse, and unauthorised access
- Monitoring platform security and system integrity
- Enforcing our Terms of Service and product-specific terms

3.4 To Improve Our Services — Legitimate Interest

- Analysing aggregated, anonymised usage patterns to improve product features and performance
- Understanding how users interact with the Anakin ecosystem to inform product development

3.5 To Communicate With You — Consent or Legitimate Interest

- Sending transactional notifications directly related to your account and activity
- Sending promotional or marketing communications, where you have opted in to receive them

Where we rely on consent as our lawful basis, you have the right to withdraw that consent at any time without affecting the lawfulness of processing carried out prior to withdrawal.

4. How We Share Your Data

We do not sell your personal data. We do not share your data with advertising networks, data brokers, or marketing third parties. We share your personal data only in the following limited circumstances:

4.1 Technical Service Providers

We engage a small number of trusted technology vendors who provide infrastructure services essential to operating the Anakin platform. These include cloud hosting providers, SMS and OTP delivery services, and identity verification API providers. These vendors process your data solely on our instruction, are contractually bound to protect it, and may not use it for any purpose of their own.

4.2 Regulatory and Legal Disclosure

We may disclose your data to regulators, law enforcement agencies, courts, or other public authorities where we are legally required to do so, or where disclosure is necessary to comply with a binding legal obligation, court order, or regulatory directive under Nigerian law.

4.3 Fraud Prevention and Security

We may share data with fraud prevention services or financial intelligence bodies where we have reasonable grounds to suspect fraudulent, criminal, or abusive activity, and where such sharing is required or permitted by law.

4.4 Business Transfers

In the event of a merger, acquisition, restructuring, or sale of all or part of The Anakin Group, your personal data may be transferred to the successor entity. We will notify you in advance of any such transfer and ensure the receiving party is bound by obligations at least as protective as those in this Policy.

5. Data Retention

We retain your personal data only for as long as is necessary to fulfil the purposes for which it was collected, or as required by applicable law and regulation.

- Account and transaction data is retained for a minimum of five (5) years following account closure, in accordance with Nigerian financial record-keeping requirements.
- Identity verification data, including BVN validation records, is retained for the duration of your account and for five (5) years thereafter.
- App usage and behavioural data used for service improvement is retained for up to two (2) years, after which it is anonymised or deleted.
- Marketing preference data is retained until you withdraw your consent or close your account.

When data is no longer required, we delete or anonymise it in a manner that prevents reconstruction of the original personal information.

6. Data Security

We take the security of your personal data seriously. We implement technical and organisational measures designed to protect your data against unauthorised access, loss, alteration, or disclosure. These measures include:

- Encryption of data in transit and at rest using industry-standard protocols
- Access controls that limit data access to authorised personnel with a documented need
- Regular security assessments and monitoring of our systems and infrastructure
- Incident response procedures to detect, contain, and notify in the event of a data breach

No system is completely immune to security risks. While we take every reasonable precaution, we cannot guarantee absolute security. In the event of a data breach that is likely to result in a high risk to your rights and freedoms, we will notify you and the relevant supervisory authority as required by the NDPA.

7. Your Rights as a Data Subject

Under the NDPR and NDPA, you have the following rights in relation to your personal data. You may exercise any of these rights by contacting us at privacy@thetheanakin.com.

7.1 Right of Access

You have the right to request a copy of the personal data we hold about you and information about how it is being processed.

7.2 Right to Rectification

You have the right to request that we correct any inaccurate or incomplete personal data we hold about you.

7.3 Right to Erasure

You have the right to request deletion of your personal data where it is no longer necessary for the purpose for which it was collected, where you have withdrawn consent, or where processing was unlawful. This right is subject to our legal obligations to retain certain data under Nigerian financial regulation.

7.4 Right to Restrict Processing

You have the right to request that we restrict the processing of your data in certain circumstances, for example while a dispute about the accuracy of your data is being resolved.

7.5 Right to Data Portability

Where processing is based on your consent or a contract with you, you have the right to receive your personal data in a structured, commonly used, and machine-readable format.

7.6 Right to Object

You have the right to object to processing carried out on the basis of our legitimate interests. We will cease such processing unless we can demonstrate compelling legitimate grounds that override your interests.

7.7 Right to Withdraw Consent

Where processing is based on consent, you have the right to withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing prior to withdrawal.

7.8 Right to Lodge a Complaint

If you believe your data protection rights have been violated, you have the right to lodge a complaint with the Nigeria Data Protection Commission (NDPC) at ndpc.gov.ng.

We will respond to all data subject requests within thirty (30) days. In complex cases, we may extend this by a further thirty (30) days with notice to you.

8. Children's Privacy

Anakin services are designed for individuals who are 18 years of age or older. Users under the age of 18 may access the platform only with the verifiable consent of a parent or legal guardian, who accepts full responsibility for the minor's use of the service and compliance with these Terms and this Policy. By permitting a minor to use Anakin, the parent or guardian consents to the collection and processing of the minor's personal data as described in this Policy. We do not knowingly permit minors to create independent accounts or access products restricted to adult users, including Credits Advance. If we become aware that a minor has accessed the platform without parental consent, we will suspend that account and delete the associated personal data promptly. If you believe a minor is using Anakin without appropriate consent, please contact us at privacy@thetheanakin.com.

9. Cross-Border Data Transfers

The Anakin Group is based in Nigeria and processes most of your data within Nigeria. Where we engage third-party service providers whose infrastructure is located outside Nigeria, we

ensure that appropriate safeguards are in place for any transfer of personal data, in accordance with the requirements of the NDPA.

Such safeguards may include standard contractual clauses approved by the NDPC, or transfers to jurisdictions that have been determined to provide an adequate level of data protection. We will not transfer your data to a country without adequate safeguards in place.

10. Cookies and Tracking

The Anakin mobile application does not use browser cookies. We do collect certain device and usage data through the application as described in Section 2 of this Policy. This data is used solely for service delivery, security monitoring, and product improvement.

If we launch a web-based interface in the future, we will update this Policy to include a full cookies and tracking disclosure before that interface is made available.

11. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, services, or applicable law. When we make material changes, we will notify you through the app or via your registered contact details before the changes take effect.

The version number and effective date at the top of this document will always reflect the most current version. We encourage you to review this Policy periodically.

12. Contact Us

For any questions, concerns, or requests relating to this Privacy Policy or your personal data, please contact our Data Protection Officer:

Data Protection Officer

The Anakin Group

Abuja, Nigeria

privacy@thetheanakin.com

thetheanakin.com

We take all privacy enquiries seriously and will respond within thirty (30) days.

End of Privacy Policy — Version 1.0