

# Bantoo Privacy Policy

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## Table of Contents

1. Introduction
2. Age Requirement
3. Information We Collect
4. How We Use Your Information
5. Legal Basis for Processing (For Users in the EU and Other Jurisdictions)
6. Sharing of Your Information
7. International Data Transfers
8. Your Privacy Rights
9. Data Security
10. Data Retention
11. Cookies and Similar Technologies
12. Third-Party Links and Services
13. Children's Privacy
14. Changes to This Privacy Policy
15. Governing Law and Dispute Resolution
16. Acknowledgement and Consent
17. Contact Information

## Summary Section

This Privacy Policy explains how we collect, use, share, and protect your personal information when you use our services. We are committed to ensuring the privacy and security of your information. Below is a summary of our key practices:

1. **Age Requirement:** Our services are not intended for users under 16 years.
2. **Data Collection:** We collect information you provide directly to us, automatically through your use of our services, and from third-party sources.
3. **Data Usage:** We use your data to provide and improve our services, personalise user experiences, and communicate with you, for marketing purposes, and legal compliance.

4. **Data Sharing:** We may share your data with service providers, partners, other users, and third-party platforms, during business transfers, and to comply with legal requirements.
5. **International Transfers:** Your data may be transferred to and processed in countries outside of your residence. We ensure appropriate safeguards are in place.
6. **Your Rights:** You have rights regarding your data, including access, correction, deletion, objection to processing, and portability.
7. **Security:** We implement robust measures to protect your information.
8. **Retention:** Your data is retained only as long as necessary for the purposes outlined in this policy.
9. **Cookies:** We use cookies and similar technologies for various purposes, including improving user experience and analytics.
10. **Policy Changes:** We will notify you of significant changes to this policy and update the effective date accordingly.
11. **Acknowledgement and Consent:** By using Bantoo, you acknowledge and agree to the terms of this Privacy Policy.
12. **Contact:** You can contact us for privacy-related inquiries or complaints via the provided contact details.

Please read the entire Privacy Policy below to understand our practices in detail.

## 1. Introduction

Welcome to Bantoo. Bantoo ("**we**," "**our**," or "**us**") is a social media platform that allows individuals and communities to create, share, and engage with content in a safe and dynamic online environment. This Privacy Policy describes how we collect, use, disclose, and protect your personal information when you use Bantoo.

We are committed to safeguarding your privacy and ensuring your personal information is processed in accordance with applicable data protection laws, including but not limited to the **Nigeria Data Protection Act (NDPA) and the Nigerian Data Protection Regulation (NDPR)**, the **General Data Protection Regulation (GDPR)** of the European Union, the **California Consumer Privacy Act (CCPA)**, and other relevant privacy laws where applicable.

This Privacy Policy applies to all individuals who access or use Bantoo's services, regardless of their geographic location. By using Bantoo, you acknowledge and consent to the practices outlined in this Privacy Policy.

If you do not agree with the terms of this Policy, please discontinue your use of Bantoo immediately.

If you have any questions or concerns about this Privacy Policy or our data practices, please contact us at [admin@bantooapp.com](mailto:admin@bantooapp.com).

## **2. Age Requirement**

Bantoo is intended **solely for individuals who are 16 years of age or older**. We do not knowingly collect, use, or process personal information from individuals under 16 years.

If you are under the age of 16, you are **strictly prohibited** from accessing or using Bantoo. Parents or legal guardians who become aware that their child under the age of 16 has provided us with personal information should promptly contact us at [admin@bantooapp.com](mailto:admin@bantooapp.com). Upon receiving a verifiable request, we will take appropriate steps to delete such information from our records.

By accessing or using Bantoo, you affirm that you are at least 16 years old. Where required by applicable law, users above the age of 16 but below the age of majority in their jurisdiction must obtain consent from their parent or legal guardian before using Bantoo.

## **3. Information We Collect**

We collect various categories of information from and about you when you use Bantoo. This information is collected to provide, maintain, and enhance our services, as well as to ensure compliance with applicable legal requirements.

### **(a) Information You Provide to Us:**

- 1. Account Information:** When you create an account on Bantoo, we collect personal information such as your name, email address, phone number, username, password, profile picture, date of birth, gender, and any other information you provide.
- 2. Content You Share:** We collect information about the content you post, upload, or share on Bantoo, including text, photos, videos, comments, messages, and other materials you make available on our platform.

3. **Communications:** If you contact us for support, provide feedback, or interact with us in any way, we collect the information you provide during such interactions, including your email address, messages, and any related details.

**(b) Information We Collect Automatically:**

1. **Device Information:** We automatically collect information about the devices you use to access Bantoo, including your device model, operating system, IP address, browser type, device identifiers, and mobile network information.
2. **Usage Data:** We collect information about your interactions with Bantoo, including the features you use, content you view, pages visited, links clicked, search queries, and the duration and frequency of your activities.
3. **Cookies and Tracking Technologies:** We use cookies, web beacons, pixels, and similar tracking technologies to collect information about your browsing activities, preferences, and settings. You can manage your cookie preferences through your browser settings.

**(c) Information From Third Parties:**

1. **Social Media and Linked Services:** If you link your Bantoo account to third-party services (e.g., Facebook, Google), we may receive information from those services as authorised by you.
2. **Advertising Partners and Analytics Providers:** We may receive aggregated or anonymised information from advertising networks, analytics providers, and other service providers to enhance our services and provide relevant content.

**(d) Purpose of Collection:**

We collect your information for the following purposes:

1. **Providing and Improving Services:** To create and manage your account, personalize your experience, and enhance the functionality of Bantoo.
2. **Safety and Security:** To detect, investigate, and prevent fraudulent activities, harmful content, and security breaches.
3. **Communication:** To send you updates, notifications, and relevant information about Bantoo and respond to your inquiries.

4. **Advertising and Marketing:** To deliver personalized advertisements and promotional content based on your interactions with Bantoo.
5. **Legal Compliance:** To comply with applicable laws, enforce our Terms of Service, and protect our legal rights.

#### **4. How We Use Your Information**

We use the personal information we collect for various purposes, including but not limited to:

##### **(a) Providing and Improving Services:**

1. To create, maintain, and enhance your account and provide access to Bantoo features.
2. To improve the performance, functionality, and quality of our services.
3. To conduct research and analysis to optimize user experience and address issues related to platform performance.

##### **(b) Personalisation of User Experience:**

1. To tailor content, recommendations, and advertisements to your interests and interactions.
2. To remember your preferences and customise your experience on Bantoo.

##### **(c) Communication and Notifications:**

1. To send you administrative messages, security alerts, updates, and information related to Bantoo's services.
2. To respond to your inquiries, feedback, and requests for support.

##### **(d) Advertising and Marketing Purposes:**

1. To display relevant advertisements and sponsored content based on your interactions and preferences.
2. To conduct promotional activities, surveys, and other marketing efforts to enhance engagement.

##### **(e) Security and Fraud Prevention:**

1. To detect, investigate, and prevent fraudulent activities, unauthorised access, and security breaches.

2. To ensure the integrity and safety of Bantoo's platform and user data.

**(f) Compliance with Legal Obligations:**

1. To comply with applicable laws, regulations, legal processes, or enforceable governmental requests.
2. To enforce our Terms of Service, Privacy Policy, and other agreements.

**5. Legal Basis for Processing (for Users in the EU and Other Jurisdictions)**

Where required by applicable data protection laws, including the **General Data Protection Regulation (GDPR)** and other relevant privacy regulations, we process your personal information based on the following legal bases:

**(a) Consent:**

1. We rely on your consent for processing your personal information for specific purposes, such as personalised advertising and marketing communications.
2. You have the right to withdraw your consent at any time by contacting us at [admin@bantooapp.com](mailto:admin@bantooapp.com).

**(b) Performance of a Contract:** Processing your personal information is necessary to provide you with our services and to fulfil our contractual obligations to you.

**(c) Legitimate Interests:** We process your information where it is necessary for our legitimate interests, such as improving our services, ensuring security, and providing user support, except where such interests are overridden by your privacy rights.

**(d) Compliance with Legal Obligations:** We process your information where it is necessary to comply with legal and regulatory requirements.

**(e) Protection of Vital Interests:** In rare circumstances, we may process your information to protect your vital interests or the vital interests of another person.

**6. Sharing of Your Information**

We may share your personal information with third parties in the following circumstances:

**(a) With Service Providers and Partners:**

1. We may share your information with trusted service providers and partners who assist us in operating Bantoo, providing services, processing payments, hosting content, performing analytics, marketing, and ensuring security.
2. These service providers are obligated to handle your information in accordance with this Privacy Policy and applicable data protection laws.

**(b) With Other Users:**

1. Your interactions on Bantoo, such as comments, posts, and likes, may be visible to other users depending on your privacy settings.
2. Information you share publicly or with specific users will be accessible to those users.

**(c) With Third-Party Platforms:**

1. If you link your Bantoo account to third-party platforms (e.g., Facebook, Google), we may share certain information with those platforms as authorised by you.
2. Integrated services or social media features provided by third parties are governed by the privacy policies of those third parties.

**(d) For Legal Compliance and Protection of Rights:**

1. We may disclose your information if required by law, regulation, legal process, or governmental request.
2. We may also share information to protect the rights, property, and safety of Bantoo, its users, or the public, including enforcing our terms, detecting and preventing fraud, and resolving disputes.

**(e) During Business Transfers:**

1. In the event of a merger, acquisition, asset sale, restructuring, or similar transaction, your personal information may be transferred as part of the transaction.
2. We will provide notice before your personal information is transferred and becomes subject to a different privacy policy.

**(f) Aggregated or Anonymised Information:** We may share aggregated or anonymised information that cannot reasonably be used to identify you, for purposes such as research, analysis, and marketing.

## **7. International Data Transfers**

Bantoo operates globally, and your personal information may be transferred to, stored, and processed in countries outside of your own, including countries that may not have data protection laws equivalent to those in your jurisdiction.

### **(a) Explanation of Cross-Border Data Transfers:**

1. When you use Bantoo, your information may be transferred to countries outside of your country of residence, including countries that may not provide the same level of data protection.
2. By using Bantoo, you consent to the transfer of your personal information to such countries.

**(b) Safeguards Applied:** To ensure that your personal information is protected when transferred internationally, we implement appropriate safeguards, including:

1. **Standard Contractual Clauses (SCCs):** We may rely on legally approved contractual obligations to ensure that your data is protected when transferred to third-party service providers located outside of your jurisdiction.
2. **Adequacy Decisions:** Where applicable, we may transfer your personal information to countries deemed to provide an adequate level of protection by relevant data protection authorities.
3. **Additional Safeguards:** We may employ supplementary measures, such as encryption and data minimisation, to enhance data security during international transfers.

### **(c) Your Rights Regarding International Transfers:**

1. You have the right to request information about the safeguards we apply when transferring your personal information internationally.
2. To obtain more details or exercise your rights, please contact us at [admin@bantooapp.com](mailto:admin@bantooapp.com).

## **8. Your Privacy Rights**

Depending on your jurisdiction, you may have the following rights regarding your personal information:

**(a) Right to Access, Rectify, and Erase Personal Data:**

1. You have the right to request access to the personal information we hold about you and obtain a copy of such information.
2. You may request the correction of inaccurate or incomplete personal information.
3. You have the right to request the deletion of your personal information, subject to certain exceptions required by law or our legitimate business purposes.

**(b) Right to Object to Processing and Restrict Processing:**

1. You may object to the processing of your personal information if you believe it impacts your fundamental rights and freedoms.
2. You have the right to request that we restrict the processing of your personal information under certain circumstances, such as when you contest its accuracy or object to its processing.

**(c) Right to Data Portability:**

1. Where applicable, you have the right to receive your personal information in a structured, commonly used, and machine-readable format.
2. You may also request the transfer of your personal information to another service provider where technically feasible.

**(d) Right to Withdraw Consent:**

1. Where we rely on your consent to process your personal information, you have the right to withdraw your consent at any time.
2. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

**(e) Process for Exercising These Rights:**

1. To exercise your privacy rights, you may contact us at [admin@bantooapp.com](mailto:admin@bantooapp.com).
2. We may request additional information from you to verify your identity before fulfilling your request.

3. We will respond to your request within a reasonable timeframe, in accordance with applicable laws.

## **9. Data Security**

We are committed to protecting your personal information and implementing appropriate security measures to prevent unauthorised access, disclosure, alteration, or destruction of your data.

### **(a) Measures Implemented to Protect User Data:**

1. We use industry-standard security technologies and procedures to safeguard your personal information.
2. Measures include, but are not limited to, encryption, firewalls, access controls, regular security assessments, and secure data storage.
3. We ensure that our employees, contractors, and service providers are bound by confidentiality obligations and are only permitted to process your personal information on our instructions.

### **(b) Limitation of Liability for Unauthorised Access:**

1. While we implement robust security measures, no system is completely secure.
2. We are not responsible for unauthorised access to your personal information resulting from your failure to maintain the confidentiality of your account credentials or from your negligence in safeguarding your devices and information.
3. In the event of a data breach, we will promptly notify affected users in accordance with applicable data protection laws.

## **10. Data Retention**

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected, or as required by applicable laws, regulations, or legal obligations.

**(a) Duration of Data Storage:** Personal information will be retained only for as long as reasonably necessary to provide our services, comply with legal requirements, resolve disputes, enforce agreements, or as otherwise required by applicable law.

**(b) Criteria for Determining Retention Periods:**

1. The length of time we retain personal information depends on the nature of the information, the purposes for which it is processed, and applicable legal or regulatory requirements.
2. Factors considered include the necessity of the data to provide services, contractual obligations, legitimate business interests, and user requests for deletion.

**(c) Right to Request Deletion:**

1. You have the right to request the deletion of your personal information at any time.
2. Upon receiving a valid deletion request, we will take reasonable steps to delete your personal information, unless retention is required or permitted by law.

**11. Cookies and Similar Technologies**

We use cookies and similar tracking technologies to collect and store certain information when you interact with our services.

**(a) Explanation of Cookies and Tracking Technologies:**

1. Cookies are small text files placed on your device to collect standard internet log information and visitor behaviour information.
2. We also use technologies such as web beacons, pixel tags, and local storage to collect information for various purposes.

**(b) Purposes for Which They Are Used:**

1. To provide, improve, and personalise our services.
2. To understand how users interact with our website and services.
3. To remember user preferences and settings.
4. To deliver targeted advertisements and marketing messages.
5. To ensure the security and integrity of our services.

**(c) Options for Managing Cookie Preferences:**

1. You can manage or disable cookies through your browser settings.

2. You may also opt out of certain tracking technologies by following the instructions provided in our Cookie Policy or using appropriate opt-out mechanisms where available.
3. Please note that disabling cookies may affect the functionality and performance of our services.

## **12. Third-Party Links and Services**

Our platform may contain links to third-party websites, services, or applications that are not owned or controlled by us.

### **(a) Disclaimer for External Websites and Services:**

1. We are not responsible for the privacy practices, content, or security of external websites or services linked to our platform.
2. Accessing third-party websites or services through our platform is at your own risk.

### **(b) Notice of Separate Privacy Practices:**

1. Third-party websites and services may have their privacy policies, which we recommend you review before providing any personal information or engaging with their services.
2. Our Privacy Policy applies solely to information collected through our platform and services.

## **13. Children's Privacy**

We are committed to protecting the privacy of children.

### **(a) Reiteration of Age Restriction (16+):**

1. Our services are not intended for individuals under the age of 16.
2. We do not knowingly collect or solicit personal information from children under 16.

### **(b) Measures to Prevent and Address Unauthorized Use by Minors:**

1. If we become aware that we have inadvertently collected personal information from a child under the age of 16, we will promptly take steps to delete such information from our records.

2. Parents or legal guardians who believe their child has provided us with personal information may contact us to request its removal.

#### **14. Changes to This Privacy Policy**

We reserve the right to update or modify this Privacy Policy at any time to reflect changes in our practices, legal requirements, or for other operational reasons.

##### **(a) Right to Update or Modify the Policy:**

1. We may update this Privacy Policy from time to time at our sole discretion.
2. Changes will be effective immediately upon posting of the revised Privacy Policy unless otherwise specified.

##### **(b) How Users Will Be Notified of Changes:**

1. We will notify users of material changes to this Privacy Policy by posting a prominent notice on our platform or by directly communicating with users, where appropriate.
2. Continued use of our services following the posting of changes indicates your acceptance of such changes.

**(c) Effective Date of the Latest Version:** The effective date of the latest version of this Privacy Policy is indicated at the top of this document.

#### **15. Governing Law and Dispute Resolution**

This Privacy Policy and any related disputes shall be governed by and construed in accordance with the laws of Nigeria.

**(a) Applicable Laws:** All matters relating to your access to or use of our services shall be governed by the laws of the Federal Republic of Nigeria, without regard to conflict of law principles.

##### **(b) Mechanisms for Resolving Disputes:**

1. Any disputes arising under or in connection with this Privacy Policy shall be resolved through negotiation.

2. If disputes are not resolved amicably, they shall be referred to arbitration under the Arbitration and Mediation Act, Laws of the Federation of Nigeria.
3. The arbitration shall be conducted by a single arbitrator appointed by mutual agreement of the parties, or, failing such agreement, by the Chairman of the Chartered Institute of Arbitrators (Nigeria Branch).
4. The venue of arbitration shall be Lagos, Nigeria, and the language of the arbitration shall be English.
5. The decision of the arbitrator shall be final and binding on the parties.

## **16. Acknowledgment and Consent**

By accessing or using Bantoo, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. You consent to the collection, use, processing, sharing, and storage of your personal information as described in this Privacy Policy.

If you do not agree with the terms of this Privacy Policy, please discontinue the use of our services immediately.

Where required by applicable law, we will obtain your explicit consent before collecting or processing your personal information for certain activities, such as:

1. Marketing communications and personalised advertising.
2. Processing of sensitive personal information.
3. International data transfers where applicable legal frameworks require such consent.

## **17. Contact Information**

If you have any questions, concerns, or complaints regarding this Privacy Policy or our data practices, please contact us at:

1. Email: [admin@bantooapp.com](mailto:admin@bantooapp.com)