

PRIVACY POLICY

Updated at March 18th, 2026

Gxpanse (“we,” “our,” or “us”) is committed to protecting your privacy. This Privacy Policy explains how your personal information is collected, used, and disclosed by Gxpanse.

This Privacy Policy applies to our website, and its associated subdomains (collectively, our “Service”) alongside our application, Gxpanse. By accessing or using our Service, you signify that you have read, understood, and agree to our collection, storage, use, and disclosure of your personal information as described in this Privacy Policy and our Terms of Service.

Definitions and key terms

To help explain things as clearly as possible in this Privacy Policy, every time any of these terms are referenced, are strictly defined as:

- **Cookie:** small amount of data generated by a website and saved by your web browser. It is used to identify your browser, provide analytics, remember information about you such as your language preference or login information.
- **Company:** when this policy mentions “Company,” “we,” “us,” or “our,” it refers to Gxpanse Limited, (Ibeju Lekki Lagos Nigeria), that is responsible for your information under this Privacy Policy.
- **Country:** where Gxpanse or the owners/founders of Gxpanse are based, in this case is Nigeria
- **Customer:** refers to the company, organization or person that signs up to use the Gxpanse Service to manage the relationships with your consumers or service users.
- **Device:** any internet connected device such as a phone, tablet, computer or any other device that can be used to visit Gxpanse and use the services.
- **IP address:** Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.
- **Personnel:** refers to those individuals who are employed by Gxpanse or are under contract to perform a service on behalf of one of the parties.
- **Personal Data:** any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.
- **Service:** refers to the service provided by Gxpanse as described in the relative terms (if available) and on this platform.
- **Third-party service:** refers to advertisers, contest sponsors, promotional and marketing partners, and others who provide our content or whose products or services we think may interest you.
- **Website:** Gxpanse’s site, which can be accessed via this URL: <https://gxpanse.com>
- **You:** a person or entity that is registered with Gxpanse to use the Services.

What Information Do We Collect?

We collect information from you when you visit our website, register on our site, place an order, subscribe to our newsletter, respond to a survey or fill out a form.

- Name / Username
- Phone Numbers
- Email Addresses
- Password

Country and State/Region

Physical/Business Address

Delivery Addresses (including district, landmark, zip/postal code, and town)

We also collect information from mobile devices for a better user experience, although these features are completely optional:

- Location: We collect user-provided location information (country, state, address) during registration and for delivery purposes. We may derive approximate location from your IP address for fraud prevention and security purposes. We do not collect precise GPS or geolocation data from your device.

For sellers, we additionally collect the following information during the onboarding and verification process:

Business name, business category, business email, business phone number, and business address

Storefront name and storefront description

Business registration number and business registration certificate (if applicable)

Government-issued identification (ID type and uploaded ID document) for identity verification purposes

Business documents uploaded for verification are stored securely and used solely for identity and business verification.

For payment disbursement and refund processing, we collect:

Bank account details (account name, account number, bank name, and bank code)

Mobile money account details (mobile number and mobile money provider)

Third-party payment platform account identifiers (e.g., Payoneer, Wise) for cross-border payouts

We also collect and retain order history and transaction records, which may include delivery address snapshots (buyer name, email, phone numbers, and full delivery address) taken at the time of purchase for order fulfillment and dispute resolution.

When does Gxpanse use end user information from third parties?

Gxpanse will collect End User Data necessary to provide the Gxpanse services to our customers. End users may voluntarily provide us with information they have made available on social media websites. If you provide us with any such information, we may collect publicly available information from the social media websites you have indicated. You can control how much of your information social media websites make public by visiting these websites and changing your privacy settings.

When does Gxpanse use customer information from third parties?

We receive some information from the third parties when you contact us. For example, when you submit your email address to us to show interest in becoming a Gxpanse customer, we receive information from a third party that provides automated fraud detection services to Gxpanse. We also occasionally collect information that is made publicly available on social media websites. You can control how much of your information social media websites make public by visiting these websites and changing your privacy settings.

Do we share the information we collect with third parties?

We may share the information that we collect, both personal and non-personal, with third parties such as advertisers, contest sponsors, promotional and marketing partners, and others who provide our content or whose products or services we think may interest you. We may also share it with our current and future affiliated companies and business partners, and if we are involved in a merger, asset sale or other business reorganization, we may also share or transfer your personal and non-personal information to our successors-in-interest.

We may engage trusted third party service providers to perform functions and provide services to us, such as hosting and maintaining our servers and the website, database storage and management, e-mail

management, storage marketing, credit card processing, customer service and fulfilling orders for products and services you may purchase through the website. We will likely share your personal information, and possibly some non-personal information, with these third parties to enable them to perform these services for us and for you.

We may share portions of our log file data, including IP addresses, for analytics purposes with third parties such as web analytics partners, application developers, and ad networks. If your IP address is shared, it may be used to estimate general location and other technographics such as connection speed, whether you have visited the website in a shared location, and type of the device used to visit the website. They may aggregate information about our advertising and what you see on the website and then provide auditing, research and reporting for us and our advertisers.

We may also disclose personal and non-personal information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate in order to respond to claims, legal process (including subpoenas), to protect our rights and interests or those of a third party, the safety of the public or any person, to prevent or stop any illegal, unethical, or legally actionable activity, or to otherwise comply with applicable court orders, laws, rules and regulations.

We also share relevant information with the following categories of service providers to facilitate our platform operations:

Payment gateway providers (such as Paystack, Stripe, and mobile money providers) to process transactions, disbursements, and refunds. These providers have their own privacy policies governing their handling of your payment data.

Cloud infrastructure and hosting providers for secure data storage and platform operation

Email and communication service providers for transactional notifications, OTP delivery, and customer support communications

Where and when is information collected from customers and end users?

Gxpanse will collect personal information that you submit to us. We may also receive personal information about you from third parties as described above.

How Do We Use The Information We Collect?

Any of the information we collect from you may be used in one of the following ways:

- To personalize your experience (your information helps us to better respond to your individual needs)
- To improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you)
- To improve customer service (your information helps us to more effectively respond to your customer service requests and support needs)
- To process transactions
- To administer a contest, promotion, survey or other site feature
- To send periodic emails

To facilitate order fulfilment, delivery, and logistics

To process payment disbursements, refunds, and wallet operations

To verify seller identity and business registration

To prevent fraud and ensure platform security

To comply with legal and regulatory obligations

How Do We Use Your Email Address?

By submitting your email address on this website, you agree to receive emails from us. You can cancel your participation in any of these email lists at any time by clicking on the opt-out link or other unsubscribe option that is included in the respective email. We only send emails to people who have authorized us to contact them, either directly, or through a third party. We do not send unsolicited commercial emails, because we hate spam as much as you do. By submitting your email address, you also agree to allow us to use your email address for customer audience targeting on sites like Facebook, where we display custom advertising to specific people who have opted-in to receive communications from us. Email addresses submitted only

through the order processing page will be used for the sole purpose of sending you information and updates pertaining to your order. If, however, you have provided the same email to us through another method, we may use it for any of the purposes stated in this Policy. Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

Verification and One-Time Passcodes (OTPs)

To safeguard your account and ensure the integrity of transactions conducted on our platform, Gxpanse employs one-time passcodes (OTPs) as part of our identity verification process. OTPs may be transmitted to you via the following channels:

Email: OTPs are sent to the email address you provided during registration for the purposes of account verification, password reset, and authentication of sensitive account actions.

SMS/Phone: Where applicable, OTPs may be delivered via SMS to the phone number registered to your account for transaction authentication, login verification, and security alerts.

OTPs are generated automatically by our system and are valid only for a limited duration, after which they expire and cannot be reused. We do not store OTP values after they have been verified or have expired. The transmission of OTPs is facilitated through trusted third-party communication service providers who are contractually bound to process such data solely for the purpose of delivery and in accordance with applicable data protection regulations.

By registering an account on Gxpanse, you consent to receiving OTPs via the email address and phone number associated with your account. You may not opt out of receiving OTPs, as they constitute a mandatory security measure necessary for the protection of your account and the prevention of unauthorised access.

Know Your Customer (KYC) and Know Your Business (KYB) Compliance

In order to maintain a secure, lawful, and trustworthy marketplace, Gxpanse conducts Know Your Customer (KYC) and Know Your Business (KYB) verification procedures in accordance with applicable Nigerian laws, including the Money Laundering (Prohibition) Act, the Nigeria Data Protection Regulation (NDPR), and the Nigeria Data Protection Act (NDPA) 2023. These measures are implemented to prevent fraud, money laundering, terrorist financing, and other illicit activities on our platform.

As part of our KYC obligations, buyers and sellers may be required to provide the following for identity verification:

A valid government-issued identification document (such as a national identity card, international passport, driver's licence, or voter's card).

Proof of address or location information as declared during registration.

Any additional documentation that may be reasonably required to confirm your identity in compliance with applicable regulations.

For sellers and business accounts, our KYB verification process additionally requires:

A valid business registration certificate issued by the Corporate Affairs Commission (CAC) or equivalent authority in your jurisdiction.

Business name, registered business address, and business category.

The identity of the business owner or authorised representative, verified through a government-issued identification document.

Bank account or mobile money account details linked to the business for the purpose of payment disbursement.

All documents and personal data collected as part of KYC and KYB verification are processed on the lawful basis of legal obligation and contractual necessity. Such data is stored securely using encryption at rest and in transit, accessible only to authorised personnel, and retained only for as long as is necessary to fulfil the purposes for which it was collected or as required by applicable law. Verification documents are not shared with third parties except where disclosure is required by law, regulation, or a valid court order.

Gxpanse reserves the right to suspend, restrict, or terminate any account that fails to complete the required KYC or KYB verification, or where the information provided is found to be inaccurate, fraudulent, or otherwise non-compliant with our verification requirements.

How Long Do We Keep Your Information?

We keep your information only so long as we need it to provide Gxpanse to you and fulfil the purposes described in this policy. This is also the case for anyone that we share your information with and who carries out services on our behalf. When we no longer need to use your information and there is no need for us to keep it to comply with our legal or regulatory obligations, we'll either remove it from our systems or depersonalise it so that we can't identify you.

Specifically, the following retention periods apply:

- Active account data (personal profile, addresses, phone numbers): retained while your account remains active and for up to 60 days following account deletion.
- Financial transaction records (wallet transactions, order payment records): retained for up to 6 years after the transaction date to comply with applicable tax, accounting, and financial regulatory requirements.
- Order delivery address snapshots: anonymised after account deletion to preserve transaction integrity while protecting your privacy.
- Pending signup data (temporarily stored during registration): automatically expires within 24 hours if email verification is not completed.
- Business verification documents (seller ID, registration certificates): retained while the seller account is active and deleted within 60 days of account closure.
- Communication records (support emails, notifications): retained for up to 2 years for quality assurance and dispute resolution.

How Do We Protect Your Information?

We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information. We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology. Credit and debit card payment data is processed entirely by our third-party payment gateway providers (such as Paystack and Stripe) and is never stored on our servers. Bank account numbers and mobile money numbers collected for disbursement purposes are encrypted using AES-256 encryption at rest. Passwords are stored using industry-standard one-way hashing algorithms and are never stored in plain text. After a transaction, your private payment card information (credit card numbers, CVVs, PINs) is never kept on file in our systems. We cannot, however, ensure or warrant the absolute security of any information you transmit to Gxpanse or guarantee that your information on the Service may not be accessed, disclosed, altered, or destroyed by a breach of any of our physical, technical, or managerial safeguards.

Could my information be transferred to other countries?

Gxpanse is incorporated in Nigeria. Information collected via our website, through direct interactions with you, or from use of our help services may be transferred from time to time to our offices or personnel, or to third parties, located throughout the world, and may be viewed and hosted anywhere in the world, including countries that may not have laws of general applicability regulating the use and transfer of such data. To the fullest extent allowed by applicable law, by using any of the above, you voluntarily consent to the trans-border transfer and hosting of such information.

Is the information collected through the

Gxpanse Service secure?

We take precautions to protect the security of your information. We have physical, electronic, and managerial procedures to help safeguard, prevent unauthorized access, maintain data security, and correctly use your information. However, neither people nor security systems are foolproof, including encryption systems. In addition, people can commit intentional crimes, make mistakes or fail to follow policies. Therefore, while we use reasonable efforts to protect your personal information, we cannot guarantee its absolute security. If applicable law imposes any non-disclaimable duty to protect your personal information, you agree that intentional misconduct will be the standards used to measure our compliance with that duty.

Can I update or correct my information?

The rights you have to request updates or corrections to the information Gxpanse collects depend on your relationship with Gxpanse. Personnel may update or correct their information as detailed in our internal company employment policies.

Customers have the right to request the restriction of certain uses and disclosures of personally identifiable information as follows. You can contact us in order to (1) update or correct your personally identifiable information, (2) change your preferences with respect to communications and other information you receive from us, or (3) delete the personally identifiable information maintained about you on our systems (subject to the following paragraph), by cancelling your account. Such updates, corrections, changes and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion. To protect your privacy and security, we may take reasonable steps (such as requesting a unique password) to verify your identity before granting you profile access or making corrections. You are responsible for maintaining the secrecy of your unique password and account information at all times.

You should be aware that it is not technologically possible to remove each and every record of the information you have provided to us from our system. The need to back up our systems to protect information from inadvertent loss means that a copy of your information may exist in a non-erasable form that will be difficult or impossible for us to locate. Promptly after receiving your request, all personal information stored in databases we actively use, and other readily searchable media will be updated, corrected, changed or deleted, as appropriate, as soon as and to the extent reasonably and technically practicable.

If you are an end user and wish to update, delete, or receive any information we have about you, you may do so by contacting the organization of which you are a customer.

Account Deletion

You may initiate the deletion of your account at any time through your profile settings. Before your account is permanently deleted, the system will automatically review your account for any pending transactions, active orders, or remaining wallet balance. If any of these are detected, you will be notified and given the opportunity to:

Resolve or cancel any pending transactions and active orders before proceeding with deletion.

Withdraw any remaining funds from your wallet to your registered bank account or mobile money account prior to account closure.

Once all outstanding matters have been resolved and you confirm the deletion request, we will permanently delete your personal profile information, delivery addresses, and phone numbers from our active systems within 60 days. We will anonymise your information in existing order records and transaction histories to preserve platform integrity while removing your identifiable data. Financial transaction records will be retained only as required by applicable law (up to 6 years for regulatory compliance), after which they will be permanently deleted. All active sessions, access tokens, and authentication credentials will be revoked immediately upon processing the request.

Please note that once your account is deleted, this action cannot be reversed. You will no longer be able to log in, access your order history, or use any platform services. Should you wish to use Gxpanse again, you will need to create a new account.

Personnel

If you are a Gxpanse worker or applicant, we collect information you voluntarily provide to us. We use the information collected for Human Resources purposes in order to administer benefits to workers and screen applicants.

You may contact us in order to (1) update or correct your information, (2) change your preferences with respect to communications and other information you receive from us, or (3) receive a record of the information we have relating to you. Such updates, corrections, changes and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion.

Sale of Business

We reserve the right to transfer information to a third party in the event of a sale, merger or other transfer of all or substantially all of the assets of Gxpanse or any of its Corporate Affiliates (as defined herein), or that portion of Gxpanse or any of its Corporate Affiliates to which the Service relates, or in the event that we discontinue our business or file a petition or have filed against us a petition in bankruptcy, reorganization or similar proceeding, provided that the third party agrees to adhere to the terms of this Privacy Policy.

Affiliates

We may disclose information (including personal information) about you to our Corporate Affiliates. For

purposes of this Privacy Policy, "Corporate Affiliate" means any person or entity which directly or indirectly controls, is controlled by or is under common control with Gxpanse, whether by ownership or otherwise. Any information relating to you that we provide to our Corporate Affiliates will be treated by those Corporate Affiliates in accordance with the terms of this Privacy Policy.

Governing Law

This Privacy Policy is governed by the laws of Nigeria without regard to its conflict of laws provision. You consent to the exclusive jurisdiction of the courts in connection with any action or dispute arising between the parties under or in connection with this Privacy Policy except for those individuals who may have rights to make claims under Privacy Shield, or the Swiss-US framework.

The laws of Nigeria, excluding its conflicts of law rules, shall govern this Agreement and your use of the website. Your use of the website may also be subject to other local, state, national, or international laws.

By using Gxpanse or contacting us directly, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, you should not engage with our website, or use our services. Continued use of the website, direct engagement with us, or following the posting of changes to this Privacy Policy that do not significantly affect the use or disclosure of your personal information will mean that you accept those changes.

Your Consent

We've updated our Privacy Policy to provide you with complete transparency into what is being set when you visit our site and how it's being used. By using our Gxpanse platform, registering an account, or making a purchase, you hereby consent to our Privacy Policy and agree to its terms.

By creating an account on Gxpanse (whether as a buyer or a seller), you explicitly confirm that:

You have read and understood this Privacy Policy and our Terms of Service.

You consent to the collection, processing, and storage of your personal data as described in this policy.

You understand you may withdraw your consent at any time by deleting your account or contacting us at support@gxpanse.com, without affecting the lawfulness of processing carried out prior to your withdrawal.

Your consent is recorded at the time of account registration. We maintain a timestamped record of your acceptance of this Privacy Policy and our Terms of Service.

Links to Other Websites

This Privacy Policy applies only to the Services. The Services may contain links to other websites not operated or controlled by Gxpanse. We are not responsible for the content, accuracy or opinions expressed in such websites, and such websites are not investigated, monitored or checked for accuracy or completeness by us. Please remember that when you use a link to go from the Services to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including those that have a link on our platform, is subject to that website's own rules and policies. Such third parties may use their own cookies or other methods to collect information about you.

Cookies

Gxpanse uses "Cookies" to identify the areas of our website that you have visited. A Cookie is a small piece of data stored on your computer or mobile device by your web browser. We use Cookies to enhance the performance and functionality of our website but are non-essential to their use. However, without these cookies, certain functionality like videos may become unavailable or you would be required to enter your login details every time you visit the website as we would not be able to remember that you had logged in previously. Most web browsers can be set to disable the use of Cookies. However, if you disable Cookies, you may not be able to access functionality on our website correctly or at all. We never place Personally Identifiable Information in Cookies.

Blocking and disabling cookies and similar technologies

Wherever you're located you may also set your browser to block cookies and similar technologies, but this action may block our essential cookies and prevent our website from functioning properly, and you may not be able to fully utilize all of its features and services. You should also be aware that you may also lose some saved information (e.g. saved login details, site preferences) if you block cookies on your browser. Different browsers make different controls available to you. Disabling a cookie or category of cookie does not delete the cookie from your browser, you will need to do this yourself from within your browser, you should visit your browser's help menu for more information.

Payment Information

We use third-party payment gateways, such as Paystack, Stripe, mobile money providers, and local bank integrations, to collect and disburse payments on our platform. We do not store credit or debit card numbers, CVVs, PINs, or other sensitive card authentication data in our systems. All card payment information is handled, transmitted, and encrypted entirely by the respective payment gateway providers in compliance with Payment Card Industry Data Security Standards (PCI DSS).

For the purpose of payment disbursement (seller payouts and buyer refunds), we collect and securely store bank account details. Bank account numbers and mobile money numbers are encrypted using AES-256 encryption at rest. Account names and bank names are stored to facilitate correct routing of funds.

Where sellers opt to receive cross-border payouts, we may store third-party payment platform account identifiers (such as Payoneer or Wise account IDs) solely for the purpose of processing international disbursements.

We retain payment transaction records (including transaction amounts, dates, references, and statuses) for the purposes of accounting, dispute resolution, and compliance with applicable financial regulations. These records do not include raw card payment details.

Gxpanse operates strictly as a marketplace platform and does not facilitate peer-to-peer fund transfers between users, bill payment services, lending, or loan servicing of any kind. Funds deposited into a user's Gxpanse wallet may only be used to purchase products or services listed on the platform from registered sellers and space owners. All transactions are conducted exclusively within the Gxpanse ecosystem and are subject to the platform's terms and conditions.

Kids' Privacy

Our Service is not directed to children under the age of 13 (or 16 in the European Economic Area). We do not knowingly collect personal information from children under 13. If we become aware that we have collected personal data from a child under the age of 13 without verification of parental consent, we will take steps to promptly delete that information from our servers. If you are a parent or guardian and you believe your child has provided us with personal data without your permission, please contact us at support@gxpanse.com so that we can take appropriate action.

Changes To Our Privacy Policy

We may change our Service and policies, and we may need to make changes to this Privacy Policy so that they accurately reflect our Service and policies. Unless otherwise required by law, we will notify you (for example, through our Service) before we make changes to this Privacy Policy and give you an opportunity to review them before they go into effect. Then, if you continue to use the Service, you will be bound by the updated Privacy Policy. If you do not want to agree to this or any updated Privacy Policy, you can delete your account.

Third-Party Services

We may display, include or make available third-party content (including data, information, applications and other products services) or provide links to third-party websites or services ("Third- Party Services").

You acknowledge and agree that Gxpanse shall not be responsible for any Third-Party Services, including their accuracy, completeness, timeliness, validity, copyright compliance, legality, decency, quality or any other aspect thereof. Gxpanse does not assume and shall not have any liability or responsibility to you or any other person or entity for any Third-Party Services.

Third-Party Services and links thereto are provided solely as a convenience to you and you access and use

them entirely at your own risk and subject to such third parties' terms and conditions.

Facebook Pixel

Facebook pixel is an analytics tool that allows you to measure the effectiveness of your advertising by understanding the actions people take on your website/app. You can use the pixel to: Make sure your ads are shown to the right people. Facebook pixel may collect information from your device when you use the service. Facebook pixel collects information that is held in accordance with its Privacy Policy

Tracking Technologies

- Google Maps API

Google Maps API is a robust tool that can be used to create a custom map, a searchable map, check-in functions, display live data synching with location, plan routes, or create a mashup just to name a few.

Google Maps API may collect information from You and from Your Device for security purposes.

Google Maps API collects information that is held in accordance with its Privacy Policy

- Cookies

We use Cookies to enhance the performance and functionality of our platform but are non-essential to their use. However, without these cookies, certain functionality like videos may become unavailable or you would be required to enter your login details every time you visit the platform as we would not be able to remember that you had logged in previously.

- Local Storage

Local Storage sometimes known as DOM storage, provides web apps with methods and protocols for storing client-side data. Web storage supports persistent data storage, similar to cookies but with a greatly enhanced capacity and no information stored in the HTTP request header.

- Sessions

We use "Sessions" to identify the areas of our platform that you have visited. A Session is a small piece of data stored on your computer or mobile device by your web browser.

Information about General Data Protection Regulation (GDPR)

We may be collecting and using information from you if you are from the European Economic Area (EEA), and in this section of our Privacy Policy we are going to explain exactly how and why is this data collected, and how we maintain this data under protection from being replicated or used in the wrong way.

What is GDPR?

GDPR is an EU-wide privacy and data protection law that regulates how EU residents' data is protected by companies and enhances the control the EU residents have, over their personal data.

The GDPR is relevant to any globally operating company and not just the EU-based businesses and EU residents. Our customers' data is important irrespective of where they are located, which is why we have implemented GDPR controls as our baseline standard for all our operations worldwide.

What is personal data?

Any data that relates to an identifiable or identified individual. GDPR covers a broad spectrum of information that could be used on its own, or in combination with other pieces of information, to identify a person. Personal data extends beyond a person's name or email address. Some examples include financial information, political opinions, genetic data, biometric data, IP addresses, physical address, sexual orientation, and ethnicity.

The Data Protection Principles include requirements such as:

- Personal data collected must be processed in a fair, legal, and transparent way and should only be used in a way that a person would reasonably expect.
- Personal data should only be collected to fulfil a specific purpose and it should only be used for that purpose. Organizations must specify why they need the personal data when they collect it.
- Personal data should be held no longer than necessary to fulfil its purpose.
- People covered by the GDPR have the right to access their own personal data. They can also request a copy of their data, and that their data be updated, deleted, restricted, or moved to another organization.

Why is GDPR important?

GDPR adds some new requirements regarding how companies should protect individuals' personal data that they collect and process. It also raises the stakes for compliance by increasing enforcement and imposing greater fines for breach. Beyond these facts it's simply the right thing to do. At Gxpanse we strongly believe that your data privacy is very important and we already have solid security and privacy practices in place that go beyond the requirements of this new regulation.

Individual Data Subject's Rights - Data Access, Portability and Deletion

We are committed to helping our customers meet the data subject rights requirements of GDPR. Gxpanse processes or stores all personal data in fully vetted, DPA compliant vendors. We do store all conversation and personal data for up to 6 years unless your account is deleted. In which case, we dispose of all data in accordance with our Terms of Service and Privacy Policy, but we will not hold it longer than 60 days.

We are aware that if you are working with EU customers, you need to be able to provide them with the ability to access, update, retrieve and remove personal data. We got you! We've been set up as self service from the start and have always given you access to your data and your customers data. Our customer support team is here for you to answer any questions you might have about working with the API.

In addition to the rights described above, data subjects under the GDPR are entitled to:

Right to Data Portability: You may request a copy of your personal data in a structured, commonly

used, machine-readable format (such as JSON or CSV). We will provide this data within 30 days of a verified request.

Right to Rectification: You may request correction of any inaccurate or incomplete personal data we hold about you.

Right to Restriction of Processing: You may request that we limit the processing of your personal data under certain circumstances, such as when you contest the accuracy of your data or object to our processing.

Right to Object: You may object to the processing of your personal data for direct marketing purposes at any time.

To exercise any of these rights, please contact us at support@gxpanse.com. We will respond to your request within 30 days.

California Residents

The California Consumer Privacy Act (CCPA) requires us to disclose categories of Personal Information we collect and how we use it, the categories of sources from whom we collect Personal Information, and the third parties with whom we share it, which we have explained above.

We are also required to communicate information about rights California residents have under California law. You may exercise the following rights:

- **Right to Know and Access.** You may submit a verifiable request for information regarding the: (1) categories of Personal Information we collect, use, or share; (2) purposes for which categories of Personal Information are collected or used by us; (3) categories of sources from which we collect Personal Information; and (4) specific pieces of Personal Information we have collected about you.
- **Right to Equal Service.** We will not discriminate against you if you exercise your privacy rights.
- **Right to Delete.** You may submit a verifiable request to close your account and we will delete Personal Information about you that we have collected.
- **Request that a business that sells a consumer's personal data, not sell the consumer's personal data.**

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

We do not sell the Personal Information of our users.

For more information about these rights, please contact us.

California Online Privacy Protection Act (CalOPPA)

CalOPPA requires us to disclose categories of Personal Information we collect and how we use it, the categories of sources from whom we collect Personal Information, and the third parties with whom we share it, which we have explained above.

CalOPPA users have the following rights:

- **Right to Know and Access.** You may submit a verifiable request for information regarding the: (1) categories of Personal Information we collect, use, or share; (2) purposes for which categories of Personal Information are collected or used by us; (3) categories of sources from which we collect Personal Information; and (4) specific pieces of Personal Information we have collected about you.
- **Right to Equal Service.** We will not discriminate against you if you exercise your privacy rights.
- **Right to Delete.** You may submit a verifiable request to close your account and we will delete Personal Information about you that we have collected.
- **Right to request that a business that sells a consumer's personal data, not sell the consumer's personal data.**

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

We do not sell the Personal Information of our users.

For more information about these rights, please contact us.

Nigeria Data Protection Regulation (NDPR)

Gxpanse is incorporated in Nigeria, and we comply with the Nigeria Data Protection Regulation (NDPR) 2019 and the Nigeria Data Protection Act (NDPA) 2023. Under the NDPR, we process your personal data on the following lawful bases:

Consent: You provide explicit consent to the collection and processing of your personal data when you register an account on our platform.

Contractual Necessity: We process your personal data as necessary to fulfil our contractual obligations to you, including processing orders, facilitating payments, and delivering products.

Legal Obligation: We retain certain financial and transaction records as required by Nigerian tax, financial, and commercial laws.

Legitimate Interest: We process limited data (such as IP addresses) for fraud prevention, platform security, and service improvement, where such processing does not override your fundamental rights.

As a data subject under the NDPR, you have the right to: (1) be informed about how your data is collected and used; (2) access your personal data; (3) rectify inaccurate data; (4) object to data processing; (5) request deletion of your data; and (6) receive your data in a portable format. To exercise any of these rights, or for any data protection enquiry, please contact our Data Protection Officer at support@gxpanse.com.

Contact Us

Don't hesitate to contact us if you have any questions.

- Via Email: support@gxpanse.com