VAQFLOW TECHNOLOGIES LTD

PRIVACY POLICY

Effective Date: 26 November 2026. **Policy version:** 2026-11-26 (replaces version 2026-10-15).

1. INTRODUCTION AND DATA PROTECTION ROLES

Vaqflow Technologies Ltd (RC 9881462), a company incorporated under the laws of the Federal Republic of Nigeria with its registered address at No. 6, Sule Abuka Crescent, Off Opebi Road, Ikeja, Lagos State ("Vaqflow", "we", "us", or "our"), provides a digital platform for managing property and construction projects, including milestone verification and workflow orchestration ("Vaqflow Build"). We also provide a digital platform for managing estates and facilities, including maintenance requests, resident invoices and online payments, and visitor access ("Vaqflow Maintain"). Together, Vaqflow Build and Vaqflow Maintain are referred to as the "Platform".

We are committed to protecting your privacy and processing personal data in strict compliance with the Nigeria Data Protection Act (NDPA) 2023 and the directives of the Nigeria Data Protection Commission (NDPC).

Data Controller and Data Processor Roles:

- **Vaqflow as Independent Data Controller:** For user accounts, authentication, sign-in security, audit logs, billing, and platform fee and payment records across the Platform, Vaqflow acts as an Independent Data Controller.
- **Vaqflow as Data Processor (Vaqflow Maintain):** Within Vaqflow Maintain, each estate, residents' association, or facility management company (an "Estate") determines which residents, units, maintenance requests, vendors, visitor passes, and gate entries are recorded on the Platform and for what purposes. For such Estate-specific information, the Estate is an Independent Data Controller in its own right, and Vaqflow processes that data strictly as a Data Processor on the Estate's behalf pursuant to a written Data Processing Agreement under Section 29 of the NDPA 2023.
- **Payment Provider as Independent Data Controller:** For regulated card and bank payment processing, authentication, and fund settlement in Vaqflow Maintain, Paystack Payments Limited acts as an Independent Data Controller under its own privacy notice and Central Bank of Nigeria regulations.

This Privacy Policy explains how Vaqflow handles personal data in both its Controller and Processor capacities. For any privacy-related inquiries, rights requests, or to contact our Data Protection Officer (DPO), please write to hello@vaqflow.com.

2. PERSONAL DATA WE COLLECT

We collect personal data directly from you, through your interactions with our platform, from Estates that manage your residence or facility, and via automated technical processes. The categories of personal data we process include:

- **Account Information:** Full name, email address, phone number, and user role (Owner or Builder in Vaqflow Build; resident, estate manager, company administrator, technician or gate account in Vaqflow Maintain). Passwords are stored exclusively as salted, one-way cryptographic hashes. We also record the date, time, and version of our Terms and Conditions and Privacy Policy that you accept.
- **Identity Verification (KYC) Data (Vaqflow Build):** Government-issued identification (NIN, international passport, driver's license, or permanent voter's card), date of birth, Bank Verification Number (BVN), Tax Identification Number (TIN), and photographs or scans of identification documents. We do not utilize automated facial recognition or automated identity decisions; all identity verifications are reviewed manually by authorized personnel.
- **Corporate & Professional Data (Builders):** Corporate Affairs Commission (CAC) registration numbers, certificates, professional licenses, and proof of business address.
- **Project & Transactional Data (Vaqflow Build):** Project details, budgets, timelines, milestones, communications, dispute records, and uploaded files (such as photographs, contracts, permits, and invoices).
- **Financial Records:** In Vaqflow Build, bank transfer references, payment records, and builder payout account details. In Vaqflow Maintain, invoices issued to you or your unit, online payments made (amount, fees, date, payment method such as card or bank transfer, and receipt number), off-platform payment records logged by an Estate, and an Estate's receiving bank account (bank name, account number, and verified account holder name). We never collect, process, or store your payment card number, expiry date, or security code; you enter those details directly on the Payment Provider's hosted checkout page.
- **Estate and Residence Data (Vaqflow Maintain):** The estate, building, and unit you belong to, your relationship to the unit, your request to join an Estate, and the Estate Manager's approval or refusal decision.
- **Maintenance Request and Vendor Data (Vaqflow Maintain):** Maintenance reports you submit (description, category, urgency, location within the unit), the status history, notes added by Estate Managers, technicians, or vendors, and photographs or files you attach. Estates may also record the name, phone number, and email address of third-party technicians and vendors they engage.
- **Visitor and Gate Data (Vaqflow Maintain):** For each visitor pass, the visitor's name, optional phone number, entry note, pass code, and validity period. For each entry at the gate, the date, time, and name of the security guard recorded by the gate account.
- **Notifications Data:** In-app alerts, emails, and push notifications sent regarding invoices, payments, maintenance requests, projects, and visitor passes, together with delivery logs.
- **Technical & Security Data:** IP addresses, browser or device types, sign-in timestamps and outcomes, mobile push notification tokens, and system activity logs (audit trails).

We do not collect geolocation tracking, device contact lists, or device contents outside the files you explicitly choose to upload.

3. LAWFUL BASIS FOR PROCESSING

In accordance with Section 25 of the NDPA 2023, we process personal data relying on the following lawful bases:

- **Contractual Necessity:** To create and administer your account, facilitate construction project milestones, process escrow funding workflows, and resolve disputes in Vaqflow Build. In Vaqflow Maintain: to issue invoices and receipts, orchestrate online payments you initiate, manage maintenance requests, and generate and verify visitor passes.
- **Legal Obligation:** To verify identities where applicable, comply with Nigerian Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) laws, maintain statutory financial and tax records, and respond to lawful requests from courts, regulators, and law enforcement authorities.
- **Legitimate Interest:** To secure our platform, detect and prevent fraud, maintain audit trails, deliver operational alerts regarding your projects, invoices, payments, requests, and visitors, and support estate access-control records for premises security. Where we rely on legitimate interest, we verify that our or the Estate's interest does not override your fundamental rights and freedoms.
- **Explicit Consent:** Where under the NDPA 2023, we obtain your explicit consent before processing sensitive personal data (such as BVN and government-issued identification records).

Third-Party Personal Data (Visitors, Vendors, and Security Guards): In Vaqflow Maintain, a Resident or Estate Manager may enter a visitor's name and phone number when generating a visitor pass, and Estates may record vendor contact details and security guard names. Although visitors do not hold Vaqflow accounts, we process visitor pass and gate-entry data on the Estate's behalf on the basis of the Estate's legitimate interest in physical access control and premises security, strictly for the limited retention periods in Section 6. Any Resident or Estate Manager entering a visitor's details warrants that they have a lawful basis to provide that information and, where practicable, have notified the visitor. Vendor contact details and guard names are processed on the Estate's behalf on the basis of contractual necessity and legitimate interest in facility management and premises security.

4. DATA SHARING AND DISCLOSURE

We do not sell your personal data. We disclose personal data only under the following controlled circumstances:

- **Platform Users (Role-Based Access):** In Vaqflow Build, Owners and Builders collaborating on a project view mutually relevant project data, milestones, and payment statuses, but cannot view each other's KYC documents, BVN, TIN, or internal business certificates. In Vaqflow Maintain, a resident sees only the invoices, payments, maintenance requests, and visitor passes associated with their own unit. Estate Managers and company administrators see records exclusively for their own estate(s), and cannot access another company's data. Technicians see only maintenance requests assigned to them. Gate accounts see only the minimal data needed to admit a visitor (pass code, validity, unit, and the visitor's name and entry note) and never see the visitor's phone number or who created the pass.

- **Authorized Vaqflow Personnel:** Authorized Vaqflow administrators can access platform data strictly on a need-to-know basis to operate, secure, and support the Platform, including reviewing KYC submissions and approving changes to an Estate's receiving bank account.
- **Escrow Banking Partners (Vaqflow Build — Demonstration Mode):** Vaqflow Build is currently operated in Demonstration Mode without live custody or disbursement of project funds. When live project funding is activated on Vaqflow Build, project funds will be held exclusively by independent financial institutions licensed by the Central Bank of Nigeria (CBN), and transfer details and payment instructions will be shared with those partner banks solely to facilitate lawful custody and milestone-based release of funds. This Policy will be updated to identify our licensed banking partner prior to live activation.
- **Payment Provider (Vaqflow Maintain):** We integrate with Paystack Payments Limited, a CBN-licensed Payment Solution Service Provider acting as an Independent Data Controller, to process online payments in Vaqflow Maintain. When you initiate an invoice payment, Vaqflow transmits your email address, transaction amount, and internal payment reference to Paystack. You enter your card or bank credentials directly on Paystack's hosted checkout page, governed by Paystack's own Privacy Policy (available at Paystack Privacy Policy). Paystack settles the Estate's share directly into the Estate's bank account and settles applicable fees to Vaqflow.
- **Third-Party Data Processors:** We engage trusted infrastructure and service providers operating under contractual data protection obligations to run the Platform, including Railway (application and database hosting), Amazon Web Services S3 (private file storage), Vercel (website delivery), Postmark (transactional email delivery), and Expo, Apple, and Google (mobile push notification delivery).
- **Legal & Regulatory Authorities:** We disclose data when legally compelled by a valid court order, warrant, or lawful directive from a regulatory or law enforcement body.
- **Business Transfers:** If Vaqflow undergoes a merger, acquisition, reorganization, or sale of assets, personal data may be transferred as part of that transaction subject to continued protection under this Privacy Policy and prior notice to affected users.

5. CROSS-BORDER DATA TRANSFERS

To operate the Platform reliably, your personal data may be transferred to and stored on secure cloud infrastructure located outside Nigeria, including the United States of America (such as Amazon Web Services S3, Postmark, Railway, Vercel, and push notification services operated by Expo, Apple, and Google).

In addition, although Paystack Payments Limited is incorporated in Nigeria, it operates on global cloud infrastructure (including the United States and the European Economic Area) as part of the Stripe group, and transfers payment data under its own NDPA-compliant safeguards and privacy notice.

Whenever Vaqflow transfers personal data outside Nigeria, we comply strictly with Sections 41 to 43 of the NDPA 2023 by relying on adequacy decisions issued by the NDPC or by implementing appropriate contractual safeguards, including Standard Contractual Clauses (SCCs) and written Data Processing Addenda (DPAs) with our cloud service providers, to ensure your personal data receives a level of protection equivalent to Nigerian law.

6. DATA RETENTION POLICY

We retain personal data only for as long as necessary to fulfill the purposes outlined in this Policy, or to satisfy statutory legal, tax, accounting, and anti-fraud obligations under Nigerian law:

Data Category	Retention Period	Basis and Notes
Maintenance Requests & Attached Files	3 years after ticket closure (or up to 6 years if linked to a billed invoice or formal dispute)	Facility warranty and operational history, subject to Estate instructions upon contract termination.
Visitor Pass Personal Data (Name, Phone Number, Note)	90 days after pass expiry	Automatically cleared once the 90-day security review window expires.
Gate Entry Logs (Date, Time, Guard Name)	12 months from entry date	Estate security audit trail without indefinite retention of guard data.
Sign-In Attempt Records (IP Address, Device, Result)	12 months	Cybersecurity monitoring and forensic incident review.
Closed Vaqflow Maintain Accounts	Immediate profile deletion; 6 years for statutory payment records	Name, email, and phone number are removed or anonymized upon account deletion; statutory invoice and payment records are kept for 6 years with personal identifiers limited to what is legally required to preserve valid tax and audit receipts.
Identity Verification (KYC) Records (Vaqflow Build)	Rejected or replaced submissions: sensitive content deleted 90 days after the decision or replacement. Approved submissions: kept while the account is active and for 5 years after the account is closed, then sensitive content deleted.	Sensitive content means ID numbers, dates of birth, BVN, TIN, CAC and licence numbers, and uploaded identification documents. After deletion we keep only the record that a verification took place (its outcome, dates, and reviewer) and the anonymized fingerprints described below.
Fraud Prevention Fingerprints (Vaqflow Build)	Retained for anti-fraud integrity	Strictly anonymized, one-way cryptographic hashes of ID and BVN numbers (irreversible) kept solely to prevent fraudulent account recreation.

7. YOUR DATA PRIVACY RIGHTS

Under the NDPA 2023, you possess the following rights regarding your personal data:

- **Right of Access:** Request confirmation and a copy of the personal data we hold about you.
- **Right to Rectification:** Request correction of inaccurate or incomplete personal data.

- **Right to Erasure:** Request deletion of your personal data, subject to overriding statutory retention periods (such as 6-year financial and tax records in Section 6) or unresolved active project or payment dependencies.
- **Right to Restrict Processing:** Request a limitation on how your personal data is processed.
- **Right to Data Portability:** Request your personal data in a structured, commonly used, and machine-readable format.
- **Right to Withdraw Consent:** Withdraw consent previously granted, without affecting the lawfulness of processing carried out before withdrawal.

Exercising Your Rights: To submit a request, email hello@vaqflow.com. We may verify your identity before acting and will respond to all legitimate requests within thirty (30) days. You may also independently update profile information or initiate account deletion via your account settings.

Requests Concerning Estate-Controlled Data (Including Visitors). Where a rights request concerns personal data controlled by an Estate in Vaqflow Maintain, such as unit records, maintenance tickets, visitor passes, or gate entries, you (including non-user visitors) may still send your request to hello@vaqflow.com. Vaqflow will forward the request to the relevant Estate within five (5) business days, notify you of the referral, and assist the Estate in responding within the statutory thirty (30) day window.

8. DATA SECURITY

Vaqflow maintains robust technical and organizational safeguards to protect personal data:

- All data transmitted between your device and our servers is secured using HTTPS encryption.
- Passwords, BVNs, TINs, and Administrator authenticator secrets are cryptographically secured in our databases.
- Uploaded files are stored in private, non-public cloud storage buckets governed by strict role-based access controls.
- Payment card details never reach or touch Vaqflow's servers; they are captured solely on Paystack's hosted checkout page.
- An Estate's receiving bank account number is stored encrypted and is displayed in masked form, except to the authorized Vaqflow administrators performing approval checks.
- Any change to an Estate's receiving bank account requires bank account name verification, a one-time email verification code to the requesting manager, Vaqflow administrator approval, and an alert to the Estate's co-managers. Online payments are recorded only upon direct confirmation from Paystack.

Data Breach Notification (Section 40, NDPA 2023):

- **Where Vaqflow acts as Data Controller:** In the event of a personal data breach likely to pose a risk to your rights and freedoms, we will notify the Nigeria Data Protection Commission (NDPC) within seventy-two (72) hours of becoming aware of the breach, and will notify affected individuals without undue delay where the breach poses a high risk.

- **Where Vaqflow acts as Data Processor:** If a personal data breach affects Estate-controlled data in Vaqflow Maintain, Vaqflow will notify the affected Estate (as Data Controller) without undue delay upon discovery so that the Estate can discharge its statutory notification obligations to the NDPC and affected individuals.

9. COOKIES AND MOBILE PERMISSIONS

- **Cookies:** Our website utilizes strictly necessary cookies (such as vf_session) exclusively to keep you signed in securely. We do not deploy third-party advertising or behavioural analytics cookies.
- **Mobile Application Permissions:** The Vaqflow mobile app will only request permission to access your camera, photo library, or push notifications solely when functionally necessary for actions you initiate. It does not access your device contacts or geolocation.

10. CHILDREN'S PRIVACY

Vaqflow's services are restricted to individuals aged 18 and older. We do not knowingly collect data from minors. If we discover that a minor has registered or submitted personal data, we will immediately delete the account and associated data.

11. COMPLAINTS AND UPDATES

We reserve the right to update this Privacy Policy periodically to reflect legal, regulatory, or operational changes. Significant changes will be communicated via email or in-app notifications prior to taking effect.

If you have any questions, concerns, or complaints regarding our data protection practices, please contact us at hello@vaqflow.com. You also have the right at any time to lodge a formal complaint with the Nigeria Data Protection Commission (NDPC).