

PRIVACY POLICY

XPOUCH App

Last updated: 01-01-2026

This Privacy Policy explains how **KUMAIL Innovations Limited** ("XPOUCH ", "we", "our", or "us") collects, uses, stores, shares, and protects personal data when you access or use the **XPOUCH mobile application, website, and related services** (collectively, the "**Services**").

We are committed to protecting your personal data in accordance with the **Nigeria Data Protection Act (NDPA) 2023**, the **Nigeria Data Protection Regulation (NDPR)**, and other applicable laws.

By using our Services, you acknowledge that you have read and understood this Privacy Policy.

1. Scope & Purpose

This Privacy Policy applies to all users of XPOUCH , including individuals who create accounts, perform transactions, or otherwise interact with our Services.

Our Services are **not intended for individuals under the age of 16**, and we do not knowingly collect personal data from minors.

XPOUCH may suspend or terminate your account without notice if:

- You breach these Terms
- Required by law or regulation
- Fraud, abuse, or security risks are detected

Termination does not relieve you of obligations incurred prior to termination.

2. Information We Collect

2.1 Personal Information You Provide

We may collect personal data including, but not limited to:

- Full name
- Phone number
- Email address

- Residential address
- Date of birth
- Government-issued identification (e.g., NIN, Passport, Driver's License)
- Bank account, debit card, or wallet details
- Profile photo or selfie (for identity verification)
- Transaction history
- Communications with customer support

2.2 Automatically Collected Information

When you use the Services, we may automatically collect:

- Device information (device type, OS, identifiers)
- IP address
- Log data and usage patterns
- App interaction data
- Location data (where required for service delivery or compliance)

2.3 Information from Third Parties

We may receive data from third parties such as:

- Identity verification providers
- Payment processors and banks
- Fraud detection and compliance partners
- Analytics and technology service providers

This data is processed strictly for lawful and permitted purposes.

3. How We Use Your Information

We use your personal data to:

- Create and manage your account
- Process transactions and payments
- Verify identity (KYC)
- Comply with legal and regulatory obligations (AML/CFT)
- Prevent fraud and unauthorized access
- Communicate service updates and notifications
- Improve platform performance and user experience
- Respond to inquiries, disputes, or complaints

Marketing communications are only sent where permitted by law, and you may opt out at any time.

4. Legal Basis for Processing

We process your personal data based on one or more of the following lawful grounds:

- Your **consent**
- Performance of a **contract**
- Compliance with **legal obligations**
- Legitimate business interests, where applicable

5. Disclosure of Personal Data

We do **not sell** your personal data.

We may share your data with:

- Banks and payment service providers
- Identity verification and compliance partners
- Technology vendors and infrastructure providers
- Regulators, law enforcement, or courts where required by law
- Professional advisers in the event of audits, disputes, or business restructuring

All third parties are required to implement appropriate data protection measures.

6. International Data Transfers

Where personal data is transferred outside Nigeria, we ensure such transfers comply with GDPR requirements and appropriate safeguards are in place.

7. Data Retention

We retain your personal data only for as long as necessary to:

- Provide the Services
- Meet legal, regulatory, and accounting requirements
- Resolve disputes and enforce agreements

When data is no longer required, it is securely deleted or anonymized.

8. Data Security

We implement reasonable technical and organizational safeguards to protect your personal data, including:

- Encryption of sensitive information
- Secure servers and restricted access controls
- Regular security monitoring and system updates
- Secure payment processing via licensed third parties

However, no system is completely secure, and we cannot guarantee absolute security.

9. Your Data Protection Rights

Subject to applicable law, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request deletion (where legally permissible)
- Object to or restrict processing
- Withdraw consent
- Lodge a complaint with the Nigeria Data Protection Commission (NDPC)

Requests may be subject to identity verification.

10. Cookies & Tracking Technologies

XPOUCH may use cookies and similar technologies to:

- Improve functionality
- Analyze usage
- Enhance security

You can manage cookie preferences through your device or browser settings.

11. Third-Party Links

Our Services may contain links to third-party websites or services. We are not responsible for their privacy practices, and you should review their policies separately.

12. Account Closure

If you close your account, we may retain certain data as required by law or for legitimate business purposes, including fraud prevention and regulatory compliance.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. Changes will be communicated through the app or other appropriate means. Continued use of the Services constitutes acceptance of the updated policy

14. Contact Information

If you have questions, concerns, or requests regarding this Privacy Policy or your personal data, contact us at:

Company Name: KUMAIL Innovations Limited

Email: privacy@xpouch.ng

Support Email: support@xpouch.ng