

PRIVACY POLICY

(Nigeria Data Protection Act, 2023 Compliant)

1. Introduction

This Privacy Policy explains how Corna Inc collects, uses, processes, stores, and protects personal data when you access or use our software platform (“Platform”).

We are committed to safeguarding personal data in compliance with the Nigeria Data Protection Act (NDPA) 2023 and applicable regulations issued by the Nigeria Data Protection Commission (NDPC).

2. Scope

This Privacy Policy applies to:

- Users of our software platform
- Business customers and their authorized users
- Personal data processed through the Platform

3. Data We Collect

3.1 Personal Data

We may collect:

- Name
- Email address
- Phone number
- Job title

3.2 Business & Customer Data

The User may upload limited business related data to the Platform, including employee details, services rendered, and items offered for sale. The User remains responsible for ensuring that such data is accurate and lawfully provided.

All customer data, booking information, transaction records, marketing data, analytics, and communication logs generated through the use of the Platform are collected, generated, and processed by the Platform. The Platform acts as the data controller in respect of such data and determines the purposes and means of processing.

The User acknowledges that customer relationships, sales records, marketing insights, and communication logs are created automatically by the Platform and are not uploaded by the User.

3.3 Technical & Usage Data

- IP address
- Device information
- Browser type
- Log files
- Usage analytics

4. Lawful Basis for Processing

We process personal data under the NDPA based on:

- Consent of the data subject
- Performance of a contract
- Compliance with legal obligations
- Legitimate business interests, where applicable

5. How We Use Personal Data

Personal data is processed to:

- Provide and operate the Platform
- Enable CRM, sales, and marketing functionality
- Generate analytics and performance insights
- Communicate service updates and support information
- Maintain security and prevent fraud
- Comply with legal and regulatory obligations

6. Data Controller and Data Processor Roles

- Users act as Data Controllers for customer data uploaded to the Platform
- [Company Name] acts as a Data Processor, processing data strictly on documented instructions from Users

7. Data Sharing and Disclosure

We do not sell personal data.

Data may be shared with:

- Trusted third-party service providers (hosting, analytics, support)
- Regulatory or law enforcement authorities where legally required
- Professional advisers under confidentiality obligations

All third parties are required to comply with NDPA-equivalent data protection standards.

8. Data Security

We implement appropriate technical and organizational measures to protect personal data against:

- Unauthorized access
- Loss or destruction
- Misuse or disclosure

While we take reasonable steps to protect data, no system is completely secure.

9. Data Retention

Personal data is retained only for as long as necessary to:

- Fulfill contractual obligations
- Meet legal and regulatory requirements
- Resolve disputes

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

10. Data Subject Rights

Under the NDPA, data subjects have the right to:

- Access personal data
- Request correction of inaccurate data
- Request deletion (where applicable)

- Object to or restrict processing
- Request data portability
- Withdraw consent at any time

Requests may be submitted through the contact details provided below.

11. Data Breach Notification

In the event of a personal data breach:

- We will notify affected Users without undue delay
- We will cooperate with Users to meet NDPC notification obligations

12. Cross-Border Data Transfers

Where personal data is transferred outside Nigeria, we ensure:

- NDPA-compliant safeguards
- Adequate protection mechanisms approved by law

13. Cookies and Tracking

We may use cookies and similar technologies to:

- Improve user experience
- Analyze platform usage
- Enhance system performance

Users may manage cookie preferences through browser settings.

14. Children's Data

The Platform does not impose age restrictions on use. Where personal data relating to a child is processed through the Platform, such processing shall be carried out in accordance with applicable data protection laws.

Users are responsible for ensuring that any personal data relating to a child that is submitted, generated, or otherwise made available through the Platform is provided with all required parental or guardian consent and lawful basis.

The Platform may process children’s personal data for the purposes of providing its services, facilitating transactions, record keeping, analytics, and compliance, and shall implement appropriate safeguards to protect such data.

15. Updates to This Privacy Policy

We may update this Privacy Policy from time to time to reflect legal, regulatory, or operational changes. Continued use of the Platform constitutes acceptance of the updated policy.

16. Contact Information

For privacy-related inquiries or data rights requests, contact:

Data Protection Officer (DPO)

Corna Inc

Email: support@corna.io