



1. Pap Digital Ltd Data Privacy & Consumer Protection Policy

Thanks for visiting Pap Digital Ltd. Use of the words “Pap Digital Ltd,” “we,” “us,” or “our” refer to any or all Pap Digital Ltd services, entities, and their affiliates. This document describes how and what Personal Information we collect, why we collect it, how it is utilized, stored and how our Users are protected. By continuing to use Pap Digital Ltd, you agree to this Privacy Policy. This Privacy Policy does not apply to third-party websites, products, or services, even if we provide links to them or they link to us. To provide you with our Services, we are sometimes obliged by law to collect your personal data; and by registering for and using Pap Digital Ltd, you agree that your Personal Information will be collected, handled, and protected as described in this Policy and according to the Terms and Conditions herein as applicable to the Platform.

2. Information We Collect Directly From You:

- a. **Personal Information:** We collect the following information when you register an Account: Name, Mobile Phone Number and/or Email Address. For further verification, we may collect additional information such as National Identity Card/Passport Number, Bank verification Number (BVN), Date Of Birth, Nationality, Mailing Address, Residential Address, Mobile Phone Number and Email Address, Passport Photograph and/or any other information deemed necessary to comply with our legal obligations under the relevant and applicable Financial and Anti-Money Laundering Laws.
- b. **Service Information:** We collect information you give us during any support and feedback communications via email or when you contact us through our official means of communication. We use this information to respond to your inquiries, provide support, facilitate transactions, and improve our Platform. Please note that if you are acting as an Authorized Individual on behalf of a User and are providing Personal Information for such User, you are responsible for ensuring that you have all required permissions and consents to provide such Personal Information to us for use in connection with the Platform and that our use of such Personal Information you provide to the Platform does not violate any applicable law, rule, regulation or order.

3. Information We Collect Automatically:

We may collect your personal data and store certain information automatically to the extent permitted under the applicable law when you visit the Pap Digital Ltd website or utilize our services. This information helps us address customer support issues, improve the performance of Pap Digital Ltd and Services, provide you with a streamlined and personalized experience, and protect your account from fraud by detecting unauthorized access. Information collected automatically includes:

- a. **Online Identifiers:** Geo location/tracking details, browser fingerprint, operating system, browser name and version, and/or personal IP addresses.
- b. **Usage Data:** Authentication data, security questions, click-stream data, public social networking posts, Duration times for automated traces and other data collected via cookies and similar technologies.



c. **Network URLs** (not including URL parameters or payload content) and the following corresponding information:

- Response Codes (For Example, 403, 200)
- Payload Size in Bytes
- Response Times

We may also automatically receive and record the following information on our server logs:

- How you came to and use the Services, Device Type and Unique Device Identification Numbers.
- Device Event Information (such as Crashes, System Activity and Hardware Settings, Browser Type, Browser Language, the Date and Time of your request and Referral URL).
- How your Device interacts with Pap Digital Ltd, including Pages accessed and Links clicked.
- Broad Geographic Location (Country or City-Level Location); and Other technical data collected through Cookies, Pixel Tags and other similar technologies that uniquely identify your browser.
- Application Checklist: For Advertising and Safety Use and approval of Service Applications.

We may also use Identifiers to recognize you when you access Pap via an External Link, such as a Link appearing on a Third-Party Site.

4. How We Use Your Information: We use your information, including your Personal Information, for the following purposes:

- To provide our Platform, facilitate communications and transactions on the Platform, communicate with you about your use of our Platform, respond to your inquiries, fulfill your orders, and for other customer service purposes.
- To tailor the content and information that we may send or display to you, offer location customization, personalized help, and instructions, and to otherwise personalize your experiences while using our Platform.
- To better understand how Users access and use the Platform, both on an aggregated and individualized basis, to improve our Platform and respond to User desires and preferences, and for other research and analytical purposes.

5. How We Share Your Personal Information: Information about our Users is an important part of our business. We are not in the business of selling our Users' personal information to others.

a. **For Marketing and Promotional Purposes:** For example, we may use your information, such as your Email Address, to send you News and Newsletters, Special Offers, and Promotions, to conduct Sweepstakes and Contests, or to otherwise contact you about products or information we think may interest you. We also may use the information that we learn about you to assist us in Advertising our Platform on Third-Party Websites.

- b. **For Compliance with Regulations:** We release account and other personal information when we believe release is appropriate to comply with any law or regulatory obligations, enforce or apply our Terms of Use and other agreements; or protect the rights, property, or safety of Pap Digital Ltd, our Users or others. This includes exchanging information with other companies, legal authorities, and other organizations for fraud protection.
- c. **For Expansion Purposes:** As we continue to advance Papwallet, we might sell or buy other businesses or services. During such transactions, User information is generally transferred as business assets but remains subject to the agreements made in any pre-existing Pap Digital Ltd privacy policy (unless, of course, the User consents otherwise). Also, in the unlikely event that Pap Digital Ltd is acquired, User information will be one of the transferred assets.

6. Timeframe To Retain Your Information: We retain your Personal Information for as long as you maintain an Account on Papwallet.com. We will cease to retain your Personal Information as soon as it is reasonable to assume that retention is no longer necessary for legal, accounting, compliance with Anti-Money Laundering laws, or business purposes. Please note that certain laws may require us to retain records of transactions or accounts for specified periods of time.

7. Changes To This Privacy Policy: Papwallet has the discretion to update this Privacy Policy at any time. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

8. Your Rights:

- You have the right to object to how we collect and process your personal information, please contact support@papwallet.com.
- You have the right to withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by emailing us at support@papwallet.com.
- We will process your request [within a reasonable time] from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request, unless an exception under the law or a provision in the law permits us to.
- However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal, including us being unable to perform the transactions requested by you on the Site.

9. Consumer Protection: At PAP Digital Ltd, we are committed to providing high-quality products and services to our customers. We value your trust in our business, and we understand that

customer satisfaction is essential to our success. To ensure that our customers are satisfied with our products and services, we have implemented the following Consumer Protection, Complaints Redress, and Refund Policy.

PAP believes in providing our customers with fair treatment and transparency. We will ensure that all our products and services meet the highest standards of quality, safety, and reliability. We will also ensure that our customers are provided with all the necessary information to make informed decisions about our products and services. PAP Digital Ltd is also regulated by the Federal Competition & Consumer Protection Commission of Nigeria, as established by the Federal Competition and Consumer Protection Act (FCCPA) 2018. To file a complaint with the FCCPA click <https://user.fccpc.gov.ng/signin>

- 10. Complaints Redress:** We take customer complaints seriously and are committed to resolving them as quickly and effectively as possible. If you have a complaint about our products or services, you can first contact our customer service department through our website papwallet.com, by sending an email to complaints@papwallet.com or by calling our official Phone Number: +2348130589139 We will acknowledge your complaint within 24 Hours and provide you with a resolution within 48 Hours.

If we are unable to resolve your complaint to your satisfaction, you can escalate to our Complaints Department. We will investigate your complaint thoroughly and provide you with a resolution within 3 Days.

- 11. Refund Policy:** We want you to be completely satisfied with our products and services. If you are not satisfied with a product or service, you can request a refund within 3 Days of purchase. To request a refund, you can contact our Customer Service Department through our website or by email to refunds@papwallet.com

We process all refunds within 7 Days of receiving your request. We reserve the right to refuse a refund if the product or service has been delivered, or if the refund request is outside of the 3 Days Complaints window. We also reserve the right to charge a restocking fee for certain refund services.

- 12. Your Acceptance Of Our Terms:** At PAP Digital Ltd, we are committed to providing our customers with high-quality products and services and ensuring that they are satisfied with their purchases. Our Consumer Protection, Complaints Redress, and Refund Policy is designed to ensure that our customers receive fair treatment and are provided with a quick and effective resolution to any complaints they may have. If you have any questions or concerns about our policy, please contact us through our website or by emailing info@papwallet.com

By using this Papwallet, you signify your acceptance of this policy and Terms of Use. If you do not agree to this policy, please do not use our Site.