



Privacy Policy

Effective date: **August 1st, 2026**

This Privacy Policy describes how **Borovault** (“**Borovault**”, “we”, “us”, or “our”) collects, uses, shares, and protects personal information when you use our website at <https://borovault.com.ng>, our Android and iOS mobile applications, and related services (collectively, the “Services”).

This policy is designed to meet the requirements of Google Play, the Apple App Store, and applicable data protection laws, including the Nigeria Data Protection Regulation (NDPR). The data practices described here should align with the privacy disclosures you provide in Google Play Console (Data safety) and Apple App Store Connect (App Privacy).

1. Who we are

Developer / Data controller: CitiPage

Website: <https://borovault.com.ng>

Contact: support@borovault.org

2. Scope

This Privacy Policy applies to:

- Visitors to our website;
- Users of the **Borovault** mobile application on Android and iOS;
- Users of our financial, marketplace, entertainment, lifestyle, and social features within the app.

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

3. Information we collect

Depending on how you use the Services, we may collect the following categories of information:

3.1 Information you provide directly

- **Account and profile information:** name, email address, phone number, username, profile photo, date of birth (where required for verification), and account preferences.
- **Identity and verification data:** government-issued identification, KYC documents, and biometric data where required for regulatory compliance and account security.
- **Financial and wallet information:** wallet balances, transaction history, bank account or payment method details (processed through licensed payment partners), and billing records.
- **Communications:** messages, chat content, support tickets, feedback, and correspondence with us.

3.2 Information collected automatically

- **Device information:** device model, operating system, unique device identifiers, app version, and mobile network information.
- **Log and diagnostic data:** IP address, crash reports, performance data, and error logs.

- **Location information:** approximate or precise location only when you grant permission and where needed for location-based services (for example, delivery or fraud prevention).

3.3 Information from third parties

- Payment processors and financial partners for transaction verification;
- Identity verification and fraud prevention providers;
- Analytics and advertising partners (where applicable and with appropriate consent);

4. How we use your information

We use personal information for the following purposes:

- To create, maintain, and secure your account;
- To provide financial services, wallets, payments, and transaction processing;
- To verify identity, prevent fraud, and comply with anti-money laundering (AML) and know-your-customer (KYC) obligations;
- To communicate with you about your account, transactions, updates, and support requests;
- To personalize your experience and improve our Services;
- To analyze usage, monitor performance, and fix technical issues;
- To enforce our Terms & Conditions and protect the rights, safety, and security of users and Borovault;
- To comply with legal, regulatory, and contractual obligations.

5. Legal bases and permissions

We process personal information based on one or more of the following grounds:

- **Contract:** to provide the Services you request;
- **Legal obligation:** to comply with financial, tax, and regulatory requirements;
- **Legitimate interests:** to secure, improve, and operate our platform, subject to your rights;
- **Consent:** where required for optional features such as marketing communications, precise location, or certain analytics.

You may withdraw consent at any time through in-app settings or by contacting us, without affecting the lawfulness of processing before withdrawal.

6. How we share information

We do not sell your personal information. We may share information in the following circumstances:

- **Service providers:** cloud hosting, customer support, analytics, messaging, and infrastructure partners who process data on our behalf under contractual safeguards.
- **Payment and financial partners:** licensed payment processors, banks, and financial institutions to process transactions and comply with regulations.
- **Fraud and security providers:** to detect, prevent, and investigate fraud, abuse, or security incidents.
- **Legal and regulatory disclosures:** when required by law, court order, or government request, or to protect rights, property, and safety.
- **Business transfers:** in connection with a merger, acquisition, financing, or sale of assets, subject to confidentiality obligations.
- **With your consent:** when you direct us to share information or connect with third-party services.

7. Third-party SDKs and services

Our mobile applications may include third-party software development kits (SDKs) for analytics, crash reporting, push notifications, payment processing, and authentication. These providers may collect device and usage information as described in their own privacy policies. We require partners to handle data in accordance with applicable law and our contractual requirements.

8. Data retention

We retain personal information for as long as necessary to provide the Services, fulfill the purposes described in this policy, and comply with legal, regulatory, accounting, and reporting obligations. Retention periods vary depending on the type of data and applicable law. For example, financial transaction records may be retained longer to meet regulatory requirements.

When information is no longer needed, we delete or anonymize it in accordance with our retention policies, unless further retention is required or permitted by law.

9. Security

We implement administrative, technical, and physical safeguards designed to protect personal information, including encryption in transit and at rest, access controls, and monitoring. No method of transmission or storage is completely secure, and we cannot guarantee absolute security.

You are responsible for maintaining the confidentiality of your account credentials and for notifying us promptly of any unauthorized access.

10. Your rights and choices

Depending on your location and applicable law, you may have the right to:

- Access the personal information we hold about you;
- Request correction of inaccurate or incomplete information;
- Request deletion of your personal information, subject to legal exceptions;
- Object to or restrict certain processing activities;
- Withdraw consent where processing is based on consent;
- Request a copy of your data in a portable format, where applicable;

You can manage many permissions (such as location, camera, contacts, and notifications) through your device settings. To exercise your privacy rights, contact us at support@borovault.org. We may need to verify your identity before responding.

11. Account and data deletion

If you create an account, you may request deletion of your account and associated personal data as follows:

- **In the app:** go to Settings → Account → Delete Account and follow the prompts;
- **By email:** send a deletion request to support@borovault.org from the email address linked to your account.

After verification, we will delete or anonymize your personal information within a reasonable period, except where retention is required for legal, regulatory, fraud prevention, dispute resolution, or legitimate business purposes (for example, financial record-keeping). Some information may remain in backup systems for a limited time before being permanently deleted.

Deleting your account may result in loss of access to wallet balances, transaction history, marketplace orders, and other data. Please resolve pending transactions before requesting deletion.

12. Children's privacy

The Services are not directed to children under 13 years of age (or the minimum age required in your jurisdiction). We do not knowingly collect personal information from children. If you believe a child has provided us with personal information, please contact us at support@borovault.org and we will take appropriate steps to delete such information.

13. International data transfers

Your information may be processed in countries other than your country of residence, including countries that may have different data protection laws. Where required, we implement appropriate safeguards for cross-border transfers, such as standard contractual clauses or other lawful mechanisms.

14. Third-party links and services

The Services may contain links to third-party websites, apps, or services that are not operated by Borovault. We are not responsible for the privacy practices of those third parties. We encourage you to review their privacy policies before providing personal information.

15. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. When we make material changes, we will update the effective date at the top of this page and, where appropriate, provide additional notice through the Services or by other means. Your continued use of the Services after the effective date constitutes acceptance of the updated policy.

16. Contact us

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

Borovault

Email: support@borovault.org

Website: <https://borovault.com.ng>

For privacy-related inquiries, please include "Privacy Request" in the subject line and provide sufficient detail for us to identify and respond to your request.