

PLUGR

Privacy Policy

Version 1.0 | Effective Date: July 2026 | getplugr.com

Plugr Technologies Limited ("Plugr," "we," "our," or "us") is committed to protecting your personal information. This Privacy Policy explains how we collect, use, share, and safeguard your data when you use the Plugr platform — including our website at getplugr.com, mobile applications, and WhatsApp-based services. By accessing or using Plugr, you agree to the practices described in this policy.

1. Information We Collect

1.1 Information You Provide Directly

When you register or use Plugr, we collect information you provide to us, including:

- **Identity Information:** Full name, National Identity Number (NIN), profile photograph.
- **Contact Information:** Phone number, email address, WhatsApp number.
- **Location Information:** City and state of residence or service area.
- **Professional Information (Plugs only):** Trade/skill category (e.g., electrician, plumber), work history, certifications.
- **Account Credentials:** Authentication tokens and session data.
- **Communications:** Messages sent through our WhatsApp interface or in-app chat.

1.2 Information Collected Automatically

When you interact with our platform, we automatically collect:

- Device information (type, operating system, browser).
- IP address and approximate geographic location.
- Usage data (pages visited, features used, time spent).
- WhatsApp interaction logs and Flow completion data.
- Cookies and similar tracking technologies.

1.3 Information from Third Parties

We may receive information about you from:

- **NIMC (National Identity Management Commission):** To verify your NIN during onboarding.
- **Meta Platforms:** When you interact with us via WhatsApp Business API.
- **Payment Processors:** Transaction status and confirmation data (we do not store full card details).

We collect your NIN solely for identity verification purposes. Your NIN is processed securely and is never shared with third parties beyond verification service providers.

2. How We Use Your Information

Plugr uses your personal information for the following purposes:

- **Account Creation and Management:** To register, authenticate, and manage your Plugr account.
- **Identity Verification:** To verify the identity of Plugs (service providers) using government-issued NIN.
- **Service Matching:** To connect Clients with verified Plugs based on location, trade, and availability.
- **WhatsApp Communication:** To send service notifications, onboarding flows, job updates, and support messages via WhatsApp.
- **Payment Processing:** To facilitate secure transactions between Clients and Plugs.
- **Platform Safety:** To detect fraud, abuse, and policy violations.
- **Customer Support:** To respond to inquiries and resolve disputes.
- **Analytics and Improvement:** To understand usage patterns and improve our services.
- **Legal Compliance:** To comply with applicable Nigerian laws and regulations.
- **Marketing (with consent):** To send promotional communications about Plugr features and offers.

We will never sell your personal data to advertisers or third-party data brokers. Your data is used only to operate and improve the Plugr platform.

3. Legal Basis for Processing

We process your personal data under the following legal bases in accordance with the Nigeria Data Protection Act (NDPA) 2023:

- **Contractual Necessity:** Processing required to provide the services you have requested.

- **Legitimate Interests:** Processing necessary for fraud prevention, platform security, and service improvement.
 - **Legal Obligation:** Processing required to comply with applicable Nigerian laws.
 - **Consent:** Processing based on your explicit consent, which you may withdraw at any time.
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4. Data Sharing and Disclosure

4.1 With Other Users

To facilitate service delivery, we share limited information between Clients and Plugs:

- Clients can view a Plug's name, trade, rating, city, and verification status.
- Plugs can view a Client's name, job description, and location when matched.
- Neither party receives the other's NIN, email address, or full contact details without explicit consent.

4.2 With Service Providers

We share data with trusted third-party providers who assist us in operating the platform:

- **Cloud Infrastructure:** Render (hosting), Neon (database), Upstash (caching).
- **AI Services:** Google Gemini for conversational AI features.
- **Identity Verification:** NIMC-accredited NIN verification providers.
- **Payment Processing:** Paystack for secure payment handling.
- **Messaging:** Meta Platforms for WhatsApp Business API services.

4.3 Legal Disclosures

We may disclose your information when required by law, court order, or government authority, or when necessary to protect the rights, property, or safety of Plugr, our users, or the public.

4.4 Business Transfers

In the event of a merger, acquisition, or sale of assets, your data may be transferred to the successor entity, subject to the same privacy protections described in this policy.

5. Data Retention

We retain your personal data for as long as necessary to fulfil the purposes described in this policy:

- **Active Account Data:** Retained for the duration of your account and for 2 years after account closure.
- **Transaction Records:** Retained for 7 years in compliance with Nigerian financial regulations.

- **NIN Verification Records:** Retained for the period required by NIMC guidelines.
- **Communication Logs:** Retained for 1 year for dispute resolution and safety purposes.
- **Marketing Data:** Retained until you withdraw consent or request deletion.

When data is no longer required, we securely delete or anonymise it in accordance with industry best practices.

6. Data Security

Plugr implements robust technical and organisational security measures to protect your personal information:

- **Encryption in Transit:** All data transmitted between your device and our servers is encrypted using TLS 1.3.
- **Encryption at Rest:** Sensitive data stored in our databases is encrypted at rest.
- **WhatsApp Flow Encryption:** All data exchanged through WhatsApp Flows is end-to-end encrypted using RSA-2048 and AES-128.
- **Access Controls:** Role-based access controls limit data access to authorised personnel only.
- **Authentication:** JWT-based authentication with token refresh mechanisms.
- **Rate Limiting:** API rate limiting to prevent abuse and brute-force attacks.
- **Regular Audits:** Periodic security assessments and vulnerability testing.

While we employ industry-standard security measures, no system is completely secure. We encourage you to use strong, unique passwords and report any suspicious activity to privacy@getplugr.com.

7. Your Privacy Rights

Under the Nigeria Data Protection Act (NDPA) 2023 and applicable law, you have the following rights:

Right of Access: Request 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 where we have no legitimate reason to continue processing it.

Right to Restriction: Request that we restrict processing of your personal data in certain circumstances.

Right to Data Portability: Receive your data in a structured, machine-readable format.

Right to Object: Object to processing of your data based on legitimate interests or for marketing purposes.

Right to Withdraw Consent: Withdraw consent at any time where processing is based on consent.

Right to Lodge a Complaint: File a complaint with the Nigeria Data Protection Commission (NDPC).

To exercise any of these rights, contact us at privacy@getplugr.com. We will respond within 30 days of receiving your request.

8. WhatsApp and Third-Party Services

Plugr uses the WhatsApp Business API, operated by Meta Platforms, Inc., to deliver onboarding flows and service notifications. When you interact with Plugr via WhatsApp:

- Your WhatsApp phone number and messages are processed by Meta in accordance with their Privacy Policy.
- Data you submit through WhatsApp Flows is encrypted and transmitted securely to Plugr's servers.
- We do not share your WhatsApp data with third parties beyond what is necessary to provide the service.
- You can opt out of WhatsApp communications at any time by replying STOP to any Plugr message.

Plugr is not responsible for the privacy practices of third-party platforms. We encourage you to review the privacy policies of Meta, Paystack, and other service providers you interact with.

9. Children's Privacy

Plugr services are intended for individuals who are 18 years of age or older. We do not knowingly collect personal information from minors under the age of 18.

If you believe we have inadvertently collected information from a minor, please contact us immediately at privacy@getplugr.com and we will take steps to delete such information promptly.

10. Cookies and Tracking Technologies

Our website uses cookies and similar technologies to enhance your experience:

- **Essential Cookies:** Required for the platform to function correctly (authentication, session management).
- **Analytics Cookies:** Help us understand how users interact with our platform (e.g., page views, feature usage).
- **Preference Cookies:** Remember your settings and preferences.

You can control cookies through your browser settings. Disabling certain cookies may affect the functionality of the Plugr platform. We do not use cookies for cross-site advertising or tracking.

11. International Data Transfers

Plugr is incorporated in Nigeria and primarily processes data within Nigeria. However, some of our third-party service providers may process data outside Nigeria, including in the United States and European Union.

Where data is transferred internationally, we ensure appropriate safeguards are in place, including standard contractual clauses and data processing agreements, in accordance with the NDPA 2023.

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, or legal requirements. When we make significant changes:

- We will update the "Effective Date" at the top of this document.
- We will notify registered users via email or WhatsApp message.
- For material changes, we may request renewed consent where required by law.

Your continued use of the Plugr platform after the effective date of any changes constitutes your acceptance of the updated policy. We encourage you to review this policy periodically.

13. Contact Us

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

Plugr Technologies Limited

A subsidiary of Alhazen

Lagos, Nigeria

Privacy Inquiries: privacy@getplugr.com

General Support: support@getplugr.com

Website: <https://getplugr.com>

For complaints to the regulatory authority:

Nigeria Data Protection Commission (NDPC)

www.ndpc.gov.ng