

CryptoMomo Africa - Data Privacy Policy

Reference: CMOMO-DPP-001

Version: 1.0

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Classification: Public

1. INTRODUCTION

1.1 CryptoMomo Africa Limited (including its subsidiaries) respects your privacy and is committed to protecting your personal data. This privacy policy sets out the basis on which any personal data we collect from you, that you provide to us, or that is otherwise made available to us will be processed by us.

1.2 This policy will inform you as to how we look after your personal data when you hold an account with us, use our cryptocurrency services, or visit our website at cryptomomo.africa and tell you about your privacy rights and how the law protects you under Ghana's Data Protection Act, 2012 (Act 843).

1.3 By creating an account and using CryptoMomo services, you are accepting and consenting to the practices described in this policy.

2. DEFINITIONS AND INTERPRETATION

2.1 For the purposes of this Privacy Policy:

"Applicable Law" means the Data Protection Act 2012, Act 843 as amended, including any regulations and guidelines applicable to the processing of personal data;

"Data Controller" means CryptoMomo Africa Limited as the entity that determines the purposes and means for processing personal data;

"Personal Data" means any information relating to an identified or identifiable natural person, including name, identification number, location data, online identifier, or factors specific to physical, physiological, economic, cultural, or social identity;

"Processing" means any operation performed on personal data whether automated or not;

"Website" means the website accessible through cryptomomo.africa and our mobile applications.

3. THE DATA WE COLLECT

3.1 We collect and process the following categories of personal data:

3.1.1 Identity Data: Full name, Ghana Card/National ID number, passport details, date of birth, gender, nationality, photo, and similar identification information;

3.1.2 Contact Data: Email address, telephone numbers, residential address, postal address;

3.1.3 Financial Data: Bank account details, mobile money information, card payment details, cryptocurrency wallet addresses, transaction history, source of funds documentation;

3.1.4 Technical Data: IP address, device identifiers, browser type, operating system, login data, and usage information;

3.1.5 KYC/AML Data: Identity verification documents, proof of address, employment details, enhanced due diligence information as required by law.

4. HOW YOUR PERSONAL DATA IS COLLECTED

4.1 We collect data through:

4.1.1 Information you provide directly when you register, verify your identity, make transactions, or contact our customer support;

4.1.2 Information collected automatically through your use of our website and mobile app, including technical and usage data;

4.1.3 Information from third parties including verification services, payment processors, and regulatory databases such as Ghana Revenue Authority and National Identification Authority.

5. HOW WE USE YOUR PERSONAL DATA

5.1 We process your personal data for the following purposes:

5.1.1 Service Provision: Account management, cryptocurrency transactions, wallet services, and customer support;

5.1.2 Legal Compliance: KYC verification, AML monitoring, regulatory reporting, and compliance with Ghana's financial regulations;

5.1.3 Security and Fraud Prevention: Protecting user accounts, detecting suspicious activities, and preventing financial crimes;

5.1.4 Business Operations: Analytics to improve our services, risk management, and maintaining business records.

5.2 Legal Basis for Processing:

- **Contract Performance:** Processing necessary to provide our cryptocurrency services
- **Legal Obligation:** Compliance with KYC, AML, and financial regulations
- **Legitimate Interest:** Fraud prevention, security, and service improvement
- **Consent:** Where required by law, particularly for marketing communications

6. MARKETING AND COMMUNICATIONS

6.1 We may send you information about our services, cryptocurrency education, and promotional offers based on your interests and preferences.

6.2 You can opt out of marketing communications at any time by:

- Clicking unsubscribe links in our emails
- Contacting us at
- Adjusting preferences in your account settings

7. WHO WE SHARE YOUR PERSONAL DATA WITH

7.1 We may share your personal data with:

7.1.1 Regulatory Authorities: Bank of Ghana, Ghana Revenue Authority, Economic and Organised Crime Office (EOCO), Securities and Exchange Commission Ghana, and other government agencies as required by law;

7.1.2 Service Providers: Identity verification services, payment processors, cloud storage providers, and cybersecurity firms under strict confidentiality agreements;

7.1.3 Legal Requirements: Courts, tribunals, and law enforcement in response to valid legal processes.

7.2 All third parties are required to maintain appropriate security measures and process data only as instructed by us.

8. DATA SECURITY

8.1 We implement appropriate technical and organizational measures including:

- Encryption of sensitive data both in transit and at rest
- Multi-factor authentication for account access
- Regular security audits and monitoring
- Restricted access to personal data on a need-to-know basis
- Secure backup and disaster recovery procedures

8.2 We have procedures to deal with suspected data breaches and will notify you and the Data Protection Commission where legally required.

9. DATA RETENTION

9.1 We retain personal data only as long as necessary for the purposes collected and to comply with legal obligations.

9.2 Retention Periods:

- Account and identity data: 7 years after account closure
- Transaction records: 7 years from transaction date
- KYC/AML documentation: 7 years as required by financial regulations
- Customer service records: 5 years from last interaction
- Technical logs: 2 years unless needed for security investigations

10. YOUR RIGHTS

10.1 Under Ghana's Data Protection Act, you have the right to:

a) Access: Request copies of personal data we hold about you **b) Correction:** Request correction of inaccurate or incomplete data **c) Objection:** Object to certain types of data processing **d) Erasure:** Request deletion of your data (subject to legal obligations) **e) Data Portability:** Receive your data in a structured format **f) Withdraw Consent:** Where processing is based on consent

10.2 Exercising Your Rights:

- **Email:** [info@finovaglobal.org]
- **Response Time:** We respond within 40 days as required by law
- **Identity Verification:** We may request proof of identity for security

11. INTERNATIONAL TRANSFERS

11.1 We may transfer personal data outside Ghana for processing and storage. When we do, we ensure appropriate safeguards are in place through contractual commitments and security measures.

12. COOKIES

12.1 Our website uses cookies to:

- Remember your preferences and settings
- Analyze website usage and improve user experience
- Enhance security and prevent fraud

12.2 You can manage cookie preferences through your browser settings, though this may affect website functionality.

13. COMPLAINTS AND CONTACT INFORMATION

13.1 For General Inquiries:

- **Email:** [info@finovaglobal.org]
- **Phone:** [233556724993]
- **Address:** [Kumas, Ashanti, Ghana]

13.2 For Data Protection Matters:

- **Email:** [info@finovaglobal.org]
- **Response Time:** 3 business days for initial response

13.3 Data Protection Commission Complaints: If you're not satisfied with our response, you may file a complaint with the Data Protection Commission of Ghana at www.dataprotection.org.gh

14. CHANGES TO THIS POLICY

14.1 We may update this policy from time to time to reflect changes in our practices or applicable law.

14.2 Notification of Changes:

- **Material changes:** Email notification to all users with 30 days notice
- **Non-material changes:** Updated policy posted on website with new effective date

15. ACKNOWLEDGMENT

By using CryptoMomo services, you confirm that you have read, understood, and accepted this Privacy Policy and consent to the processing of your personal data as described.

Contact Information:

- **General Support:** [info@finovaglobal.org]
- **Data Protection:** [info@finovaglobal.org]
- **Business Hours:** Monday - Friday, 9:00 AM - 3:00 PM GMT

CryptoMomo Africa Limited

Registered with the Data Protection Commission of Ghana

Registration Number: 233556724993

This privacy policy demonstrates our commitment to data protection compliance in Ghana's cryptocurrency ecosystem.