

Privacy Policy

We recognize that protecting personal information is very important to you and that you have an interest in how we collect, use, store, and share such information. We always respect our customers' privacy and personal information and we take this matter very seriously. We have worked very hard to earn our customers' trust and keeping it is our top priority. That's why we comply with the obligations that are laid out under data protection laws.

This privacy notice sets out how we, as data controllers, will use and protect your information. We will use your personal information only for the purposes and in the manner set out in this privacy notice. We recommend that you read this privacy notice carefully.

Please note: you have the right to object to the processing of your personal data where that processing is carried out for our legitimate interests or for direct marketing purposes

1. About us

Air Time Labs are operated by, and the top-up services and prepaid products available on the Applications from time to time ("Services"), are provided by, Merchantplus Integrated Services Limited ("Air Time Labs", "we" or "us"). We are registered in Nigeria with registered number 7003464 and we have our registered office at 4 Oluwatoyin Street, Onipanu, Lagos state, Nigeria.

2. How can you get in contact with Air Time Labs?

If you have any questions about this privacy notice or any other queries or complaints, our customer care team is here to help – please contact us using one of the following options:

Email us: support@airtimelabs.com

3. Scope of Air Time Lab's privacy notice?

Personal data is information that identifies a person or can be used to identify a person. For us to provide our Services to you, we need to collect and process personal data about you. Without this information, we may not be able to provide our Services to you.

This privacy notice will apply to personal data about you collected by us through the Application or otherwise.

4. What data does Air Time Lab collect?

We may collect and process the following data about you:

- Contact Details : name; email address; telephone number; passport or national identification details (in limited circumstances); social media identifiers;
- Payment Details : cardholder name; credit or debit card details (however, we only retain certain parts); chargeback information; billing address; Paypal ID; utility bill (in limited circumstances);
- Transaction Details : transaction amount and currency;

- Electronic Identifying Details : IP address; SMS content; cookies; pixels; activity logs (e.g. user session recordings); online identifiers; device identifiers (e.g. the mobile device and/or the internet browser that you use) and geolocation data;
- Correspondence and Complaints : any correspondence that you choose to send to Air Time Lab (including complaints); any information you provide to our customer care team; any information you publish about Air Time Lab (including on the app stores);
- Transaction History : details of the transactions (including date and time and relevant service provider) you carry out on, and your visits to, the Applications.

If you choose to grant the mobile applications access to contact information through your device, we may collect this information, including names, telephone numbers, email addresses and social media identifiers. We use this information to help us deliver the Services to your family and friends in the most efficient manner and for the other purposes listed below.

5. How does Air Time Lab collect your personal data?

You provide us with your personal data when you register for, or use, our Services. We may also collect personal data about you from third parties (e.g. in the event of chargebacks or through third-party direct marketing services). We also collect information about you through your use of our Applications, your visits to our Applications, your interactions with our customer care team, and the transactions you carry out on our Applications. When you visit our Applications, your device and/or browser may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connection to an Application, or other technical communications information), some of which may constitute personal data.

6. Why do we process your personal data and what is our legal basis for doing so?

Reason for processing personal data

Legal Basis for processing your personal data

To help you purchase the Services that you have requested and to process any payments, refunds or chargebacks connected with that Services request

The use is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering a contract. The use is also necessary for the purpose of our legitimate interests in managing our business operations.

To deliver the Services that you have requested to the recipient of the Services and provide receipts or transaction confirmation messages, where required

The use is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering a contract

To allow the recipient of the Services to request further Services from you and to send you a thank you message following receipt of the Services

The use is necessary for the purpose of our legitimate interests in managing our business operations.

To contact you if it's required in relation to the Services that you have sent or to reply to any communications that you might have sent us

The use is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering a contract

To provide you with information on products, services or promotions that might interest you

The use is necessary for the purpose of our legitimate interests in managing our business operations.

To notify you about any changes to the Applications or Services

The use is necessary for the purpose of our legitimate interests in managing our business operations.

To ensure that content on the Applications is presented in the most effective manner for you and your device

The use is necessary for the purpose of our legitimate interests in managing our business operations.

To provide you with customer care

The use is necessary for the purpose of our legitimate interests in managing our business operations.

For marketing analysis

The use is necessary for the purpose of our legitimate interests in managing our business operations.

For security, compliance, fraud prevention and accounting purposes

The use is necessary for compliance with our legal obligations. The use is also necessary for the purpose of our legitimate interests in managing our business operations.

To help improve our Applications and our Services

The use is necessary for the purpose of our legitimate interests in managing our business operations.

We will inform you in advance if we intend to further process your personal data for a purpose other than as set out above. We will also seek your specific consent if we carry out any processing of personal data that legally requires us to obtain such consent. You will have the right to withdraw such consent at any time.

7. Do we carry out any automated processing of your personal data?

We use automated statistical analysis of the personal data we collect about you in order to comply with our legal obligations to detect and prevent fraud, dishonesty, and other crimes. We may use automated processing to screen for suspicious transactions or to identify transactions that may be subject to international sanctions.

When we make solely automated decisions that affect you in a legal or significant way, you have the right to provide your point of view and have those decisions reviewed by a member of our staff.

8. What happens if you do not provide us with your personal data?

If you do not provide us with your personal data or object to the use of certain personal data, we may not be able to provide the Services to you.

9. Who do we disclose our personal data?

We share your personal data, where necessary, with the following recipients:

- any third party you ask us to share it with, including friends and family;
- mobile operators and other service providers (directly or via third parties);
- anti-fraud service providers;
- third-party payment processors;
- data analytics service providers
- third party service providers used for the delivery of some aspects of the Services (e.g. SMS delivery, email delivery, web notifications, app notifications, and phone number lookup);

In addition, recipients of the Services may be able to view your name when you send them mobile top-up or prepaid products. Recipients may also be able to view your name if they avail of the option to send you a thank you message. You can control whether you wish to share your name with recipients of the Services through the account settings in your Air Time Lab account.

Our Applications may interface with third-party services that you have previously interacted with (e.g. Facebook and Google), or contain links to third-party content (e.g. service provider content). Please note that Air Time Lab is not responsible for such services or content, or the privacy policies associated with those services or content. We recommend that you review any third party's privacy policy before accessing such services or content.

10. Does Air Time Lab transfer your personal data outside the EEA?

Air Time Lab may be required to transfer your personal data outside the EEA for the purposes of providing the Services. To ensure that your personal data receives an adequate level of protection and is treated securely, and where a specific derogation does not apply, we put the appropriate safeguards in place to protect the privacy and integrity of such personal data when being transferred outside the EEA (e.g. EU-approved standard contractual clauses / binding corporate rules).

11. What if Air Time Lab is bought by another company?

We reserve the right to transfer information (including your personal data) to a third party in the event of a merger, liquidation, receivership, or transfer of all or substantially all of the assets of our company. The third party must only use your personal data for the purposes that you provided it to us in the first place and as set out in this privacy notice. You will be notified in the event of any such transfer.

12. Data Security

We have implemented appropriate technical and organizational security measures designed to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure,

unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with data protection laws.

You are responsible for ensuring that any personal data that is sent to us is sent securely.

13. How long do we keep your personal data?

We will keep your personal data only for as long as necessary to carry out the purposes set out above and to comply with any legal obligations. The criteria for determining the duration for which we retain your personal data are whether it is necessary:

- to maintain an ongoing relationship with you (e.g. to provide our Services to you or where you are lawfully included in our direct marketing lists and have not unsubscribed);
- in connection with the purposes set out in this notice and where we have a valid legal basis; or
- to comply with any applicable limitation period under applicable law, and a reasonable amount thereafter.

Once the periods above have concluded, we will either:

- permanently delete or destroy the relevant personal data;
- archive your personal data so that it is beyond use; or
- anonymize the relevant personal data.

14. Where does Air Time Lab hold your personal data?

Your personal data is held by us on secure servers which are hosted by Air Time Lab or by a third-party hosting infrastructure company located within the EEA.

15. Will Air Time Lab use your personal data for direct marketing purposes?

We may use your personal data to send you information by SMS, email, or app notifications relating to our products and services which may be of interest to you or similar products and services to those you have previously purchased from Air Time Lab with your consent or where otherwise permitted to do so by local law.

16. Can you opt out/unsubscribe from direct marketing?

You will be provided with an opportunity to opt in at the point of registration. You can also opt-out at any time, free of charge, by: (i) for SMS and email, by using the unsubscribe facility in the SMS or email that Air Time Lab sends to you; (ii) for push notifications, by following the steps in the guide available at support@airtimelabs.com.

Air Time Lab does not sell or share your personal data with subsidiary companies or third parties for marketing or profit purposes.

17. Your Rights

You have a right to obtain a copy of, and the right to rectify any inaccuracies in, the personal data we hold about you by making a request to us in writing. You also have the right to request erasure,

restriction, portability, or object to the processing, of your personal data or not to be subject to a decision based on automated processing, including profiling. You should inform us of any changes to your personal data. Any requests made under this section can be made using the contact details set out below. We will respond to your request in writing, or orally if requested, as soon as practicable and in any event not more than one (1) month after receipt of your request. In each case, these rights are subject to restrictions as laid down by law.

If you are unhappy with any aspect of processing or your data protection rights please contact Air Time Lab in the first instance and we will be happy to listen to your concerns. We can be contacted as follows: support@airtimelabs.com or at Air Time Lab, 4 Oluwatoyin street, Onipanu, Lagos state, Nigeria.

If we are relying on your consent to allow us to process your information, you can withdraw your consent at any time. From that point on we would no longer be able to carry out the processing we were carrying out with your consent. Any processing we carried out before you withdrew your consent would remain valid. We do not generally rely on consent for processing personal data.

Please contact us at support@airtimelabs.com or at Air Time Lab, 4 Oluwatoyin Street, Onipanu, Lagos state, Nigeria.

18. Changes to this privacy notice

We may update this privacy notice from time to time. If we make any material changes, we will notify you by posting a notice on our applications and/or, where appropriate, by sending you a notification.