MyLoyalPoint Privacy Policy

Last updated: 21 November 2026

1. Introduction

MyLoyalPoint ("we", "our" or "us") runs a loyalty platform where customers earn and redeem points at partner businesses in Nigeria, and partners issue points and manage loyalty programmes. This Privacy Policy explains what personal data we collect, why we use it, who we share it with, how long we keep it, and the choices and rights you have.

It applies to everyone who uses our website, Customer App, Partner App and related services (together, the "Platform"), including customers, partners and their staff. We act as the data controller for the personal data described here and handle it in line with the Nigeria Data Protection Act 2023 and related regulations.

By creating an account or using the Platform, you confirm that you have read this policy.

Key terms

- **Customer**: a person who earns and redeems points.
- **Partner**: a business that issues points, creates rewards and offers, and funds a prepaid wallet on the Platform.
- **Points**: loyalty points issued to customers by partners through the Platform.
- **Personal data**: any information that identifies you or can reasonably be linked to you.

2. Personal data we collect

Data you give us

- **Account information**: full name, display name, username, email address, phone number, password, and an optional profile photo.
- **Partner business information**: business name and category, business location, contact details, staff accounts and their roles, and any verification details we ask for when you apply to become a partner.
- **Transaction information**: points earned and redeemed, purchases linked to point issuing, the partner involved, dates and amounts, rewards redeemed, wallet balances and activity.

- **Wallet and payment information**: for partners, wallet top-ups, payment references, withdrawal requests and the name of the account you pay from or withdraw to. We do not store full card details; these are handled by our payment providers.
- **Programme activity**: the offers and promotions you view or use, rewards you redeem, and how you use the app and website.
- **Support information**: messages, tickets, emails and any attachments you send us, and our replies.
- **Surveys and feedback**: responses you choose to give in surveys, competitions or promotions.

Data we collect automatically

- **Device and usage information**: device type, operating system, app version, unique device identifiers, IP address, mobile network information, log data and crash reports.
- **Location information**: with your permission, your approximate or precise location, used to show nearby partners and offers. You can switch this off in your device settings.
- **Cookies and similar technologies**: small files and identifiers that help our website and apps work and help us understand how they are used (see Section 12).

Data we receive from others

- **Partners**: information about purchases for which they issue you points, and information you give them when joining their programme.
- **Service providers**: for example payment providers confirming a top-up, or verification services confirming a phone number or email.
- **Public sources and advertising platforms**: where lawful, to verify business details or measure our advertising.

Anonymous and pseudonymised data

We may remove or replace identifying details so that data can no longer be linked to you (anonymous data), or can only be linked using a separately held key (pseudonymised data). Anonymous data is not personal data and may be used for statistics, research and product planning. Pseudonymised data remains personal data and is covered by this policy.

3. How we use your data and why

We only use personal data where the law allows. The legal bases we rely on are: **contract** (we need the data to provide the Platform to you), **consent** (you have agreed), **legal obligation**, and **legitimate interests** (a genuine business reason that does not override your rights).

What we do	Data used	Legal basis
Create and manage your account, verify your identity and keep the app working	Account, device	Contract, legitimate interests
Record points, process redemptions, run wallets and partner funding	Account, transaction, wallet	Contract
Let you find partners, rewards and offers near you	Account, transaction, location	Contract, consent for location
Send service messages about your account, transactions and security	Account, transaction	Contract, legitimate interests
Send marketing, promotions and personalised offers	Account, transaction, programme activity	Consent, legitimate interests (where the law allows)
Provide customer support and resolve disputes	Account, transaction, support	Contract, legitimate interests
Detect, prevent and investigate fraud, misuse and security incidents	Account, transaction, device, wallet	Legitimate interests, legal obligation
Keep audit logs of all transactions and activity	Account, transaction, wallet, device	Legitimate interests, legal obligation
Understand usage, fix problems and improve the Platform	Programme activity, device, support	Legitimate interests, consent for cookies
Run surveys, competitions and promotions	Account, transaction, survey	Consent, contract, legitimate interests

What we do	Data used	Legal basis
Provide partners with reports about their own programme	Transaction, programme activity (see Section 5)	Contract, legitimate interests
Meet tax, accounting, regulatory and legal requests	Account, transaction, wallet	Legal obligation
Create anonymous statistics and data models	Transaction, programme activity	Legitimate interests

Profiling and automated decisions

We may analyse your activity to suggest relevant rewards and offers, and to spot unusual or fraudulent behaviour. This can involve automated processing. We do not make decisions based solely on automated processing that have a legal or similarly significant effect on you without a way for you to ask for human review. You can ask for that review at any time using the contact details in Section 13.

Data models

We may combine data to find patterns, such as which rewards are popular or when points are usually redeemed. We build these models on an anonymous basis and may use them to improve the Platform and to give partners general insight into how customers use their programmes.

4. Marketing and your choices

We send marketing only where the law allows. You can opt out of marketing messages at any time using the unsubscribe link in a message or the notification settings in your account. You will still receive service messages, such as security alerts and transaction confirmations, because they are necessary to run your account.

5. Who we share your data with

We do not sell your personal data. We share it only as described below.

- **Partners**: when you earn or redeem points with a partner, they see the information needed to complete the transaction, such as your username, the points involved and your history with that partner. Partners also see a basic customer list for their own

programme. Partners must use this data only to run their programme with you and in line with data protection law.

- **Service providers**: companies that help us run the Platform, such as cloud hosting, payment processing, SMS and email delivery, analytics, customer support tools, security and fraud prevention. They may use your data only on our instructions and under written agreements that require them to protect it.
- **MyLoyalPoint administrators and staff**: who need access to support users, approve partners and wallets, monitor activity and keep audit records.
- **Professional advisers**: such as lawyers, auditors and insurers, where needed.
- **Authorities**: courts, regulators, law enforcement and other public bodies where we are required by law or must protect our rights, users or systems.
- **Business transfers**: if we are involved in a merger, acquisition, financing or sale of assets, we may share data with the other parties and their advisers, and transfer it to a successor who will continue to provide the Platform.
- **With your direction**: where you ask us or give your consent.

We may share anonymous or aggregated information that cannot identify you more widely.

6. Transfers outside Nigeria

Some of our service providers store or process data outside Nigeria. When we transfer personal data abroad, we make sure it is protected by appropriate safeguards required by Nigerian data protection law, such as transferring to a country or organisation recognised as providing adequate protection, or using written contracts that require equivalent protection. You can contact us for more information about the safeguards we use.

7. How long we keep your data

We keep personal data for as long as your account is active and as needed to provide the Platform. After that we keep only what we need for the following reasons, and delete or anonymise the rest:

- to meet legal, tax, accounting and regulatory requirements;
- to keep the transaction and audit logs the Platform depends on, which are designed so that they cannot be altered or deleted;
- to deal with disputes, enforce our terms and prevent fraud; and

- to honour points and wallet balances that remain valid.

If an account is inactive for a long period, we may suspend or close it under our Terms of Service. We will keep its data only as long as the purposes above require. If you ask us to delete your account, we will delete or anonymise your personal data, except for records we are required or permitted to keep.

8. Security of your data

We use technical and organisational measures to protect personal data, including encryption in transit, access controls, role-based permissions for staff and partners, activity logging and regular security reviews. Partners and customers also have a part to play: keep your password and verification codes private, only show your QR code at checkout, log out on shared devices, and remove access for former staff straight away.

Security breaches and hacks

MYLOYALPOINT BEARS NO RESPONSIBILITY IN CASE OF A SECURITY BREACH OR HACK.

No system, network or method of transmission over the internet is completely secure, and we cannot guarantee that unauthorised access, hacking, malware, theft or other attacks will never happen. By using the Platform you accept this risk. To the fullest extent permitted by applicable law, MyLoyalPoint, its directors, officers, employees and affiliates are not liable for loss, damage or disclosure of data that results from a security breach or hack, including one caused by a third party, by a failure of your own device or network, or by your failure to protect your login details.

Nothing in this section removes any duty that the law places on us. Where the law requires, we will notify the Nigeria Data Protection Commission and affected users of a personal data breach within the time the law sets, and tell you what we know and what steps you can take.

9. Your rights

Under Nigerian data protection law you have rights over your personal data, which you can exercise free of charge in most cases:

- **Access**: to know whether we process your data and to receive a copy.
- **Rectification**: to correct inaccurate or incomplete data.

- **Erasure**: to ask us to delete your data in certain circumstances.
- **Restriction and objection**: to ask us to limit how we use your data, or to object to processing based on legitimate interests or used for direct marketing.
- **Portability**: to receive your data in a commonly used, machine-readable format where this applies.
- **Withdraw consent**: at any time, without affecting processing that took place before you withdrew it.
- **Human review**: not to be subject to a decision based solely on automated processing that significantly affects you.

How to use your rights

You can view and update most details in your account profile. For any other request, email us using the details in Section 13. We may need to confirm your identity first. We will respond without undue delay and explain if we cannot fully meet a request, for example because we must keep records for legal reasons.

Some choices can affect our ability to keep your account or points active. If that applies, we will tell you before we act.

Complaints

If you are unhappy with how we handle your data, please contact us first so we can try to fix it. You also have the right to complain to the Nigeria Data Protection Commission.

10. Children

The Platform is for people aged 18 and over. We do not knowingly collect personal data from anyone under 18. If you believe a child has given us personal data, contact us and we will delete it.

11. Links and third-party services

The Platform may link to websites, apps or services run by partners or other third parties. We do not control them and are not responsible for their privacy practices. Please read their policies before you share data with them.

12. Cookies and similar technologies

We use cookies, SDKs and similar technologies to keep you signed in, remember your preferences, keep the Platform secure, measure performance and, where permitted, support marketing. Some are essential and cannot be switched off. For others, you can change your choices in your browser, device settings or any cookie settings we provide. Blocking some cookies may stop parts of the Platform from working.

13. Contact us

For questions about this policy, to exercise your rights or to raise a concern, contact the MyLoyalPoint data protection team:

- Email: info@myloyalpoint.com
- Support: support@myloyalpoint.com or the Support section of the app

14. Changes to this policy

We may update this policy from time to time to reflect changes to the Platform, the law or our practices. We will post the updated version on this page with a new "Last updated" date and, for significant changes, tell you through the app or by email. If you keep using the Platform after a change takes effect, you accept the updated policy. If you disagree, you can stop using the Platform and ask us to close your account.

Read our Terms of Service alongside this policy.