

PRIVACY & DATA POLICY

Effective Date: July 28, 2025

1. Scope

This Privacy Policy outlines how Recycool collects, uses, stores, and shares personal data. This applies to users in the UK and Nigeria and complies with the **UK GDPR** and **NDPR**.

2. Data We Collect

- **Personal Identification Info:**

We collect your full name, residential or business address, email address, and phone number when you register on Recycool. This helps us identify and communicate with you and is necessary for arranging recycling logistics.

- **Geolocation:**

With your permission, we access your device's location to show nearby recycling centers. This feature ensures efficient matching for pickups or drop-offs and helps improve user convenience.

- **Photos:**

Users may upload photos of the recyclable items they wish to recycle. These images are stored on our servers and shared with recycling facilities to help them assess the recyclables before collection.

- **Usage Data:**

We collect anonymized data about how you interact with our platform, such as pages visited, time spent, and actions taken. This data is processed through Google Analytics and stored securely using Microsoft Azure to help us improve platform performance.

- **Wallet Data:**

We maintain an internal record of your wallet balance and transactions within the platform. However, we do **not** store any sensitive payment

details such as credit card numbers or bank account information. All financial processing is handled securely by Flutterwave.

3. Why We Collect Data

- **To match users with nearby recycling facilities:**

Your location and profile information are essential for us to pair you with certified recycling partners in your area.

- **To enable communication and coordination:**

We use your contact information to allow messaging and updates between you and recycling facilities, particularly for arranging collection or drop-off details.

- **To manage wallets and withdrawals:**

Your account activity, such as wallet credits and withdrawal requests, needs to be tracked for accurate transaction processing and support.

- **To ensure platform functionality and security:**

We use analytics and technical logs to detect errors, optimize speed, and guard against fraud or abuse on the platform.

- **To improve service performance:**

By analysing how users interact with our services, we can enhance user experience, optimize features, and develop better recycling solutions.

4. Data Sharing

- **Recycling facilities can view your name and address:**

To facilitate pickups or drop-offs, the facility you are matched with will see your full name and address. This is the only personal information made visible to them.

- **No data is shared with advertisers or for marketing purposes:**

Recycool does **not** sell, rent, or give access to your personal data to advertisers or third-party marketers.

- **Third-party services that may process your data:**

- **Google Analytics:** For anonymous usage tracking and performance insights.
- **Microsoft Azure:** For secure hosting, data storage, and application performance.
- **Flutterwave:** To process payments and enable wallet transactions, in line with financial compliance standards.

5. Cookies & Tracking

- **No marketing or personalized tracking cookies:**

Recycool does not track you across websites or use cookies for advertising or profiling.

- **Analytics cookies are used anonymously:**

We use cookies only to gather aggregate performance data (like load times, popular pages, or device types) to help us improve the website. No personally identifiable data is collected through these cookies.

6. International Transfers

Recycool operates in **Nigeria and the United Kingdom**.

Because your data may be processed in either country:

- Transfers between these regions are conducted in compliance with **UK GDPR** and **Nigerian Data Protection Regulation (NDPR)**.
- Safeguards such as **Standard Contractual Clauses (SCCs)** or equivalent legal mechanisms are applied to ensure your data is protected during transfer and storage.

7. Data Security

To protect your information, we use the following safeguards:

- **Encryption** during data transmission and storage.
- **Access control** to restrict sensitive data to only authorized staff.
- **Secure hosting** via Microsoft Azure, which includes firewalls, intrusion detection, and monitoring.

We continuously monitor the platform for vulnerabilities and update our infrastructure to maintain security best practices.

8. Data Retention

- **Retained while account is active:**

Your personal data remains stored while you continue to use Recycool, to support your access and ensure functionality.

- **Deleted upon request or deactivation:**

You can request that your account and associated data be deleted. We will comply, except where we are required to retain some information:

- For legal compliance (e.g., tax records)
- For fraud prevention
- For bookkeeping or auditing (where permitted under applicable law)

9. Your Rights

Depending on your country of residence, you may exercise the following rights:

- **Access:**

You may request a copy of the personal data we hold about you.

- **Correction:**

You may request that we update or correct any inaccurate or incomplete data.

- **Withdraw Consent:**

If you've given consent for a specific type of data processing, you may withdraw it at any time (e.g., turn off location sharing in your device settings).

- **Deletion ("Right to be Forgotten"):**

You may ask us to delete your personal information permanently. Exceptions apply if we are required to retain it for legal, financial, or regulatory purposes.

- **Lodge a Complaint:**

- If you're in the **UK**, you may contact the **Information Commissioner's Office (ICO)**.
- If you're in **Nigeria**, you may reach out to the **National Information Technology Development Agency (NITDA)**.

10. Contact

For questions or requests regarding your data, contact:

Email: admin@apprecycool.com