

Privacy Policy for ICMS Technologies Ltd

1. Introduction

ICMS Technologies Ltd. ("we," "us," or "our") operates the CPaaS platform accessible via www.xcall.com.ng. We are committed to protecting your privacy and complying with the **Nigeria Data Protection Regulation (NDPR)**. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data. By using our services, you consent to the practices described herein.

2. Information We Collect

We collect the following categories of data:

- **Personal Identification Data:** Name, email, phone number, address, company details.
 - **Technical Data:** IP address, device type, browser, cookies, usage patterns (e.g., call logs, messaging metadata).
 - **Payment Data:** Billing information (processed securely via third-party gateways; we do not store card details).
 - **User Content:** Communications transmitted through our platform (e.g., SMS, voice recordings), subject to applicable laws.
 - **Third-Party Data:** Information from partners or publicly available sources (e.g., business directories).
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3. Purpose of Data Processing

We process your data to:

- Deliver and optimize our CPaaS services (e.g., voice, SMS, APIs).
 - Manage your account, payments, and customer support.
 - Send service updates, security alerts, and marketing communications (with consent).
 - Comply with legal obligations under NDPR and other Nigerian laws.
 - Improve our platform via analytics (anonymized where possible).
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4. Legal Basis for Processing

Under NDPR, we rely on:

- **Consent:** For marketing and non-essential cookies.

- Contractual Necessity:** To fulfill services you request.
 - Legal Obligation:** To meet regulatory requirements.
 - Legitimate Interests:** For fraud prevention and service improvement.
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5. Data Sharing & Disclosure

We may share data with:

- Sub-processors:** Trusted third parties assisting in service delivery (e.g., cloud providers, carriers), bound by confidentiality agreements.
 - Legal Authorities:** If required by Nigerian law or to protect our rights.
 - Business Transfers:** In case of mergers, acquisitions, or asset sales.
- We **never** sell your personal data.
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6. Data Security

We implement NDPR-aligned measures including:

- Encryption (in transit and at rest).
 - Access controls and authentication protocols.
 - Regular security audits and vulnerability testing.
 - Employee training on data protection.
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7. Data Retention

We retain your data only as long as necessary:

- For service delivery (e.g., active accounts).
- To comply with legal tax/financial obligations (typically 3 years).
- Based on consent (until withdrawn).

Data is securely deleted or anonymized thereafter.

8. Your Rights Under NDPR

You have the right to:

- Access, correct, or delete your personal data.
- Withdraw consent for marketing/cookies.
- Object to processing based on legitimate interests.
- Request data portability.

To exercise these rights, contact us at privacy@xcall.com.ng .

9. Cookies & Tracking Technologies

We use cookies for:

- Essential functions (e.g., login sessions).
- Analytics (e.g., Google Analytics, anonymized).
- Marketing (with consent).

Manage preferences via your browser settings.

10. Children's Privacy

Our services are **not directed at children under 18**. We do not knowingly collect their data. Contact us if you believe a minor has provided us with information.

12. Updates to This Policy

We may update this policy periodically. Changes will be posted on our website with the effective date. Material changes will be notified via email or platform alerts.

13. Contact Us

For questions, data requests, or to report breaches:

•**Data Protection Officer:**

Email: dpo@xcall.com.ng