

LEGAL & COMPLIANCE

Privacy Policy

How the Afrikars group collects, uses, shares and protects your information.

Effective 19 August 2026 · Supersedes the ~~version of 13 July 2026~~



ABOUT THIS POLICY

Privacy Policy

This Privacy Policy explains how AFRIKARS collects, uses, shares and protects information when you use our cross-border vehicle marketplace, website, mobile applications and related services (the "Platform"). It also explains the choices and rights you have regarding your information.

PLAIN-LANGUAGE SUMMARY

We collect the information needed to verify who you are — as the law requires of a platform handling cross-border commerce and the movement of funds — to operate the marketplace, and to keep the Platform secure. Identity documents you submit for verification are handled by our specialist verification partner and are not retained in raw form on our own systems. We do not collect or store your card numbers or bank credentials. We do not sell your personal information. You have rights over your data, described in Section 11.

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SECTION 01

Who we are

The Platform is operated by **AFRIKARS INC.**, a Delaware corporation, together with the companies it holds. In this privacy policy, "AFRIKARS", "the Company", "we", "us" and "our" refer to AFRIKARS INC. and those companies.

For the purposes of applicable data protection law, AFRIKARS INC. is the **controller** of personal data processed through the Platform. Its affiliates process personal data on its behalf where relevant to their role in a transaction. Where local law requires it, the AFRIKARS company operating in your jurisdiction may act as a joint or local controller.

AFRIKARS INC.**HOLDING COMPANY AND DATA CONTROLLER · DELAWARE, USA**

1007 N Orange St, Wilmington, Delaware 19801, United States of America

AFRIKARS MOTORS LLC**LICENSED TEXAS DEALER · UNITED STATES OPERATIONS**

11501 Domain Dr, Austin, Texas 78758, United States of America

AFRIKARS.NG LTD**NIGERIAN OPERATING COMPANY · RC 9632671**

15 Abdou Diouf Crescent, Asokoro, FCT, Nigeria

Our contact details are in Section 17.

SECTION 02

Scope of this policy

This policy applies to the personal data we process when you:

- visit or browse our website or use our mobile applications;
- create an account, list a vehicle, or place or fund an order;
- complete identity verification (KYC) or business verification (KYB);
- fund, hold or release money through your AFRIKARS wallet;
- communicate with us or use our support channels; or
- otherwise interact with the Platform.

Together, our website, mobile applications and related services are referred to in this policy as the **Platform**.

This policy does not apply to third-party websites, products or services that we do not control, even where we link to them. See Section 14.

The Platform is not intended for children. See Section 13.



SECTION 03

Information we collect

We collect the categories of information set out below, depending on how you use the Platform.

Information you provide to us

Account and profile	Name, email address, phone number, password, country, and your role on the Platform (buyer, seller or dealer).
Identity and verification (KYC)	Government-issued identity document, photograph or selfie, date of birth, address, and other data required to confirm your identity. Section 4 explains how this is handled and what we do and do not retain.
Business verification (KYB)	For business users: company registration details, ownership and beneficial-owner information, business documents, and details of authorised representatives.
Transaction, wallet and orders	Orders, listings, vehicle and shipping details, wallet balances and staged milestone approvals, invoices, and records relating to funds you deposit, hold or release on the Platform.
Communications	Messages you send to us or to other users, support requests, and feedback.

We do not collect or store full card numbers, bank credentials, or similar payment secrets. Payments are handled by our regulated payment partners, who process that data under their own terms. See Section 8.

Information we collect automatically

When you use the Platform we automatically collect certain technical and usage information, including internet protocol (IP) address, device and browser type and version, time zone setting, operating system and platform, device identifiers, approximate location derived from IP address, pages viewed, referring and exit pages, timestamps, and your interactions with listings and features. We collect this using cookies and similar technologies. See Section 7.

Information we receive from third parties

We receive information from identity-verification, payment, fraud-prevention, vehicle-data and analytics providers. For example, our verification partner returns the result of a verification check, and vehicle-history providers return report data associated with a vehicle identification number (VIN).

Aggregated data

We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data is not personal data, because it does not directly or indirectly reveal your identity. For example, we may aggregate usage data to calculate the percentage of users accessing a particular feature, in order to analyse general trends and improve the Platform. If we combine aggregated data with your personal data so that it can identify you, we treat the combined data as personal data.

SECTION 04

Identity verification (KYC / KYB)

Because AFRIKARS facilitates cross-border commerce and the movement of funds, we are required to verify the identity of our users and the legitimacy of business accounts. To do this we use **Sumsub**, a specialist identity-verification provider, and we may use other regulated verification and screening services.

How your identity documents are handled

When you submit identity or business documents for verification, those documents are collected and processed by our verification partner within its own secure environment. **AFRIKARS does not retain copies of your raw identity documents** — such as passport or driver's-licence images — on its own systems.

What we retain is the **outcome** of the check: whether verification passed or failed, the verification reference, and the limited identity attributes we are legally required to keep, such as your verified name and country.

This does not mean AFRIKARS holds no personal data about you. We remain the controller of your account, transaction, wallet, communications and technical data, and of the verification outcomes described above. Section 3 lists everything we hold.

Our verification partner

Our verification partner processes this data as our **processor**, on our instructions and under its own privacy terms. We encourage you to review Sumsub's privacy notice for details of how it handles verification data, including its own retention periods for the documents you submit. We use verification results only to confirm identity, to prevent fraud and money laundering, and to meet our legal and regulatory obligations.

SECTION 05

How we use your information

We use personal data to:

- create and manage your account and provide the Platform;
- verify your identity and eligibility, and screen for fraud, money laundering and sanctions risk;
- process, facilitate and record transactions, including staged wallet deposits and releases;
- communicate with you about your account, transactions and support requests;
- operate, maintain, secure and improve the Platform and develop new features;
- personalise your experience, including relevant listings and recommendations;
- measure and analyse usage so that we can improve service quality;
- send you service messages and, where permitted, marketing you can opt out of; and
- comply with our legal obligations and enforce our terms.

Section 6 sets out, purpose by purpose, which data we use, the legal basis we rely on, and how long we keep it.

Direct marketing

We may send you marketing communications about our products, services and offers where you have provided your consent to receive them. You may withdraw your consent or opt out at any time by following the unsubscribe instructions in our communications, or by contacting us using the details in Section 17.

Where you have provided your consent, we may analyse your account, contact, technical, usage and profile data to understand your preferences and interests, and to provide you with marketing about products, services and offers that may be relevant to you.

Third-party marketing

We will obtain your express consent before we share your personal data with any third party for that third party's own direct marketing purposes.

Opting out of marketing

You can ask us to stop sending you marketing communications at any time by following the opt-out link in any marketing communication, or by contacting us at legal@afrikars.com.

If you opt out of marketing, you will still receive service-related communications that are essential for administrative or customer-service purposes — for example order confirmations, milestone and delivery updates, warranty registration, appointment reminders, updates to our terms, and checks that your contact details are correct.

SECTION 06

Legal bases for processing

Where data protection law requires a legal basis — for example under the Nigeria Data Protection Act 2023, or the EU or UK GDPR where applicable — we rely on one or more of the following.

- **Performance of a contract with you.** Where we need to perform the contract we are about to enter into, or have entered into, with you.
- **Compliance with a legal obligation.** Where processing is necessary to comply with a legal obligation we are subject to, including identity-verification, anti-money-laundering and record-keeping requirements. We identify the relevant obligation when we rely on this basis.
- **Consent.** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose — for example certain cookies, or subscribing to marketing. Where we rely on consent, you may withdraw it at any time.
- **Legitimate interests.** Where processing is necessary to conduct our business and pursue our legitimate interests — for example to prevent fraud and to give you a secure customer experience. We consider and balance any potential impact on you and your rights, both positive and negative, before we process your personal data on this basis. We do not use your personal data for activities where our interests are overridden by the impact on you, unless we have your consent or are otherwise required or permitted to by law.

Purposes for which we use your personal data

The table below describes each way we plan to use the categories of your personal data, the legal basis we rely on, and the period for which we keep the data. Where we rely on legitimate interests, we identify what those interests are. We may process your personal data for more than one lawful basis depending on the specific purpose.



SECTION 06 / PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA

Purpose	Personal data used	Legal basis and retention period
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you This processing enables us to create and manage your customer account, authenticate your identity when you log in, communicate with you regarding your account, save your preferences, and facilitate future vehicle purchases or enquiries. For example, when you create an account to purchase a vehicle, request a quotation, reserve a vehicle, or track an order, we need this information, to establish and administer your account. Without this information, we may be unable to create your account or provide our services. We will retain account information for the duration of your customer relationship with us and for six (6) years after your account is closed or becomes inactive, unless a longer retention period is required by law or necessary for the establishment, exercise or defence of legal claims.
To verify your identity and the legitimacy of business accounts (KYC / KYB), and to screen for fraud, money laundering and sanctions risk	(a) Identity (b) Contact (c) Business verification (d) Verification outcome	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests, where we have assessed that such interests are appropriate and lawful (to prevent fraud, financial crime and unauthorised transactions) As a platform facilitating cross-border commerce and the movement of funds, we are required to establish and verify the identity of our users and the beneficial owners of business accounts, and to screen against sanctions and financial-crime lists, before and during a customer relationship. Verification is carried out by our specialist verification partner acting as our processor. Raw identity documents are held by our verification partner under its own retention schedule and are not retained by AFRIKARS. The verification outcome, the verification reference and the limited identity attributes we are required to keep are retained for the period required by applicable anti-money-laundering legislation in the relevant jurisdiction, and in any event for no shorter period than that legislation requires after the end of the customer relationship.
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Payment — held by our payment partners, not by us (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests, where we have assessed that such interests are appropriate and lawful (to recover debts due to us) This includes confirming your vehicle order, processing payments, arranging delivery or collection, issuing invoices, processing refunds, maintaining transaction records, communicating order updates, and coordinating with payment service providers, logistics providers, vehicle registration authorities (where applicable), and financing partners at your request. We also process your information where necessary for our legitimate interests in recovering debts, preventing payment fraud, verifying payment information, enforcing our contractual rights, and maintaining accurate financial records. For example, if payment for a purchased vehicle remains outstanding, we may use your contact and transaction information to send reminders or engage a debt recovery service where appropriate. We will retain order, payment and transaction for six (6) years following completion of the transaction or longer where required by applicable tax, accounting or regulatory laws or where necessary for legal claims.



Purpose	Personal data used	Legal basis and retention period
To operate your AFRIKARS wallet, including holding funds you deposit and releasing them against verified transaction milestones	(a) Identity (b) Contact (c) Transaction	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation Processing is necessary to perform our contract with you: to credit funds you deposit, to record your approval of each staged release, to release funds to the correct counterparty as each milestone is verified, and to maintain an accurate, auditable ledger of your balance and of every movement in and out of it. Processing is also necessary to comply with our legal and regulatory record-keeping obligations in relation to funds held on behalf of customers. We do not hold your card numbers or bank credentials; the underlying payment instruction is executed by our regulated payment partners. Wallet and ledger records are retained for six (6) years following completion of the related transaction, or longer where required by applicable tax, accounting, anti-money-laundering or regulatory law.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests, where we have assessed that such interests are appropriate and lawful (to keep our records updated and manage our relationship with you Processing is necessary for the performance of our contract where we communicate information affecting the services you receive, including updates relating to your orders or account. Processing is also necessary to comply with legal obligations, including notifying you of material changes to our Privacy Policy where required by applicable data protection laws. In addition, processing is necessary for our legitimate interests in maintain accurate records, responding to customer enquiries, investigating complaints, improving customer service, documenting communications and maintaining an effective customer relationship. For example, where you contact us regarding a warranty issue or a complaint about a vehicle purchase, we will process your information to investigate and respond appropriately. We will retain customer service records and correspondence for six (6) years after the matter is resolved, unless a longer retention period is required by law or necessary for the establishment, exercise or defence of legal claims.
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests, where we have assessed that such interests are appropriate and lawful (to study how customers use our products/services, to develop them and grow our business) Where participation forms part of promotional terms accepted by you, processing is necessary for the performance of a contract, enabling us to administer competitions, verify eligibility, select winners and distribute prizes. Processing may also be necessary for our legitimate interests in understanding customer preferences, improving our products and services, evaluating customer satisfaction survey after purchasing a vehicle, we may analyse your responses to improve our purchasing and delivery processes Competition and survey data will generally be retained for two (2) years after completion of the promotion or survey unless legal or regulatory obligations require longer retention.



Purpose	Personal data used	Legal basis and retention period
To administer and protect our business and the Platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests, where we have assessed that such interests are appropriate and lawful (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation Processing is necessary for our legitimate interests in operating, maintaining and securing the Platform, protecting our IT infrastructure, detecting and preventing fraud, investigating security incidents, troubleshooting technical issues, backing up data, conducting system maintenance, monitoring Platform performance, managing business continuity, and support mergers, acquisitions or corporate restructuring where appropriate. We also process personal data where necessary to comply with legal obligations, including maintaining appropriate security measures, responding to lawful requests from regulators or law enforcement, and complying with applicable cybersecurity and record-keeping requirements. For example, we may analyse IP addresses and device information to detect fraudulent attempts to purchase vehicles or gain unauthorised access to customer accounts. Technical logs and security records are generally retained for twelve (12) months, while records relating to security incidents may be retained for up to six (6) years where necessary to investigate incidents or defend legal claims.
To deliver relevant Platform content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests, where we have assessed that such interests are appropriate and lawful (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) [Where permitted by law, processing is necessary for our legitimate interests in understanding customer interests, displaying relevant vehicle listings and promotions, improving our advertising strategy, limiting repetitive advertising, and measuring campaign effectiveness. Where applicable cookie or electronic marketing laws require it, we will rely on your consent before placing non-essential cookies or using similar technologies for personalised advertising or tracking. For example, if you browse electric vehicles on the Platform, we may display advertisements featuring similar vehicles or related accessories, provided we have the appropriate lawful basis. Advertising and analytics information will generally be retained for up to twenty-four (24) months, subject to your cookie preferences and applicable legal requirements.
To use data analytics to improve the Platform, our products and services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Consent, having obtained your prior consent to obtaining your data for the purpose of conducting market research.



Purpose	Personal data used	Legal basis and retention period
To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Consent, having obtained your prior consent to receiving direct marketing communications. Where required by applicable law, we rely on your consent before sending electronic marketing communications such as promotional emails, SMS messages or personalised advertising. You may withdraw your consent or opt out of marketing communications at any time without affecting the lawfulness of processing carried out before withdrawal. For example, after purchasing an SUV, we may send information about servicing packages or accessories where permitted by law or where you have consented to receive marketing. Marketing preferences will be retained until you withdraw your consent or object to processing, and for up to two (2) years thereafter to maintain suppression records and ensure your preferences are respected.
To carry out market research through your voluntary participation in surveys	(a) Identity (b) Contact (c) Profile (d) Usage	Consent, having obtained your prior consent to receiving direct marketing communications Survey responses will generally be retained for two (2) years after collection, or longer where responses have been anonymised for statistical purposes, in which case they may no longer constitute personal data.



SECTION 06 · CONTINUED

SECTION 07

Cookies and tracking technologies

We use cookies and similar technologies — such as local storage and pixels — to run the Platform, remember your preferences, keep you signed in, secure your session, and understand how the Platform is used so that we can improve it.

Strictly necessary	Enable core functions such as sign-in, security and session management. These cannot be switched off.
Functional	Remember your settings and preferences to improve your experience.
Analytics and performance	Help us understand how the Platform is used so that we can improve it.
Marketing	Used, where enabled, to measure and improve the relevance of our communications.

You can control non-essential cookies through our cookie banner or settings, and through your browser controls. Blocking some cookies may affect how the Platform works. Where the law requires it, we set non-essential cookies only with your consent, and you may withdraw that consent at any time.

SECTION 08

How we share information

We do not sell your personal information.

We share personal data only as described in this section, and only where there is a lawful basis for doing so and appropriate safeguards are in place.

Companies within the Afrikars group

We share personal data between AFRIKARS INC. and the companies it holds where this is necessary to complete a transaction — for example between the United States purchasing entity and the Nigerian importing entity in the course of sourcing, exporting, clearing and delivering a vehicle.

Service providers acting as our processors

- identity and business verification providers, including Sumsub;
- payment service providers, payment gateways and financial institutions that process deposits, transfers, payouts and refunds, and that detect fraudulent transactions;
- cloud hosting, infrastructure, software and website hosting providers that support the operation and security of the Platform;
- vehicle inspection, valuation, verification, history and pricing providers;
- delivery, logistics, shipping and vehicle transportation companies responsible for moving vehicles, spare parts and accessories;
- fraud prevention, identity verification, sanctions screening and cybersecurity providers;
- customer support providers, call centre operators and communication platform providers;
- marketing, advertising and analytics providers, subject to your preferences and applicable law; and
- professional advisers, including lawyers, auditors, accountants, consultants and insurers.

Other parties involved in your transaction

- **Other users**, as needed to complete a transaction — for example limited details shared between a buyer and a seller to arrange a sale, shipment or delivery;
- vehicle manufacturers, authorised dealers and distributors, to facilitate a sale, warranty registration, recall or after-sales support;
- vehicle registration, licensing and customs authorities, where disclosure is necessary to import, register or transfer ownership of a vehicle, or to comply with applicable legal requirements;
- banks, financing partners and lending institutions, where you request vehicle financing or hire-purchase facilities;
- credit reference agencies, where you apply for financing or credit-related services and where permitted by applicable law;

- insurance providers and brokers, where you request quotations or purchase insurance through the Platform;
- warranty administrators, extended warranty providers and roadside assistance providers, where you subscribe to those services; and
- trusted business partners providing optional products or services you have requested, such as servicing, maintenance packages or accessories.

Legal and corporate disclosures

- **Regulators, law enforcement agencies, courts, government authorities and advisers**, where disclosure is required by law, court order or regulatory obligation, or to protect our rights, our users and the integrity of the Platform;
- **In a corporate transaction** — a merger, acquisition, financing or reorganisation, or a sale or transfer of part of our business or assets — subject to appropriate protections. If a change happens to our business, the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our service providers to use your personal data for their own purposes, and we permit them to process it only for specified purposes and in accordance with our instructions.

SECTION 09

International data transfers

AFRIKARS operates across the United States, Nigeria and other markets, so your personal data may be transferred to and processed in countries other than your own — including the United States and Nigeria. Those countries may have data protection laws that differ from those in your location.

Whenever we transfer personal data across borders, we take steps to ensure it remains protected in line with this policy and applicable law, using the safeguards below.

- **Within the Afrikars group.** We require all companies in the group to follow the same set of rules when processing personal data. These rules are called binding corporate rules. To request a copy, contact us at legal@afrikars.com.
- **To service providers.** Where we transfer personal data to providers that carry out functions on our behalf, we put contractual protections in place — including, where applicable, standard contractual terms approved for use in Nigeria — which give the transferred data the same protection as it has in the country it came from. To obtain a copy of these safeguards, contact us at legal@afrikars.com.

Transfers of personal data out of Nigeria are made only where an adequate safeguard is in place, or where the transfer is otherwise permitted under the Nigeria Data Protection Act 2023 and the directives made under it.

SECTION 10

Data retention

We keep personal data only for as long as it is needed for the purposes described in this policy, and then delete or anonymise it. The table in Section 6 sets out the retention period that applies to each purpose.

To determine the appropriate retention period we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process it, whether we can achieve those purposes by other means, and the applicable legal, regulatory, tax, accounting and anti-money-laundering requirements.

By law we have to keep basic information about our customers — including contact, identity and transaction data — for six years after they cease being customers, for tax purposes. Records relating to identity verification and financial-crime screening are retained for the period required by applicable anti-money-laundering legislation in the relevant jurisdiction, which may extend beyond the closure of your account.

Raw identity documents are retained by our verification partner under its own retention schedule, not by AFRIKARS. See Section 4.

We may retain personal data for a longer period where there is a complaint, or where we reasonably believe there is a prospect of litigation in relation to our dealings with you.

In some circumstances you can ask us to delete your data: see Section 11. In some circumstances we will anonymise your personal data, so that it can no longer be associated with you, for research or statistical purposes. We may use anonymised information indefinitely without further notice to you.

SECTION 11

Your rights and choices

You have a number of rights under data protection law in relation to your personal data. Subject to applicable law, you have the right to:

- **Request access** to your personal data — commonly known as a subject access request. This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully.
- **Request correction** of the personal data we hold about you. This enables you to have incomplete or inaccurate data corrected, though we may need to verify the accuracy of the new data you provide.
- **Request erasure** of your personal data where there is no good reason for us to continue processing it, where you have successfully objected to processing, where we have processed your information unlawfully, or where we are required to erase it to comply with local law. We may not always be able to comply for specific legal reasons, which we will notify to you at the time of your request.
- **Object to processing** where we rely on a legitimate interest as the legal basis. In some cases we may demonstrate that we have compelling legitimate grounds that override your right to object.
- **Object to direct marketing** at any time. This right is absolute — see "Opting out of marketing" in Section 5.
- **Request the transfer** of your personal data to you or to a third party, in a structured, commonly used, machine-readable format. This right applies to automated information which you initially provided consent for us to use, or which we used to perform a contract with you.
- **Withdraw consent** at any time where we rely on consent. This will not affect the lawfulness of any processing carried out before you withdraw it. If you withdraw consent we may not be able to provide certain products or services to you, and we will tell you if that is the case at the time.
- **Request restriction of processing.** This enables you to ask us to suspend processing in one of the following situations:
 - if you want us to establish the accuracy of the data;
 - where our use of the data is unlawful but you do not want us to erase it;
 - where you need us to hold the data even though we no longer require it, because you need it to establish, exercise or defend a legal claim; or
 - where you have objected to our use of the data but we need to verify whether we have overriding legitimate grounds to use it.
- **Lodge a complaint** with your data protection authority. In Nigeria this is the Nigeria Data Protection Commission (NDPC).

How to exercise your rights

To exercise any of these rights, contact us at legal@afrikars.com using the details in Section 17.

No fee usually required

You will not have to pay a fee to access your personal data, or to exercise any of your other rights. We may charge a reasonable fee, or refuse to comply with your request, if it is clearly unfounded, repetitive or excessive.



What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data, or to exercise any of your other rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request, to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month, and in any event within the timeframes required by applicable law. Occasionally it may take us longer if your request is particularly complex, or if you have made a number of requests. In that case we will notify you and keep you updated.

Complaints

Before complaining to a regulator, please make your complaint to us first, or ask us for clarification if there is something you do not understand — the NDPC will expect you to have done so before it reviews your complaint. You can complain to us by writing to legal@afrikars.com.

SECTION 12

Data security

We use technical and organisational measures designed to protect personal data against accidental loss and against unauthorised access, use, alteration or disclosure. These include encryption in transit, access controls, monitoring, and the use of vetted providers for sensitive processing such as identity verification and payments.

We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They process your personal data only on our instructions, and they are subject to a duty of confidentiality.

We have procedures in place to deal with any suspected personal data breach, and we will notify you and any applicable regulator of a breach where we are legally required to do so.

No system is completely secure, so we cannot guarantee absolute security — but we work to protect your data and to respond promptly to any incident as required by law.

SECTION 13

Children's privacy

The Platform is intended for adults and is not directed to children. We do not knowingly collect personal data from anyone under the age of 18, or under the age of majority in your jurisdiction where that age is higher.

If you believe that a minor has provided us with personal data, please contact us at legal@afrikars.com and we will take appropriate steps to delete it.

SECTION 14

Third-party links and services

The Platform may link to, or integrate with, third-party websites, plug-ins, applications and services — including verification, payment, shipping and vehicle-data providers. Clicking on those links, or enabling those connections, may allow third parties to collect or share data about you.

We do not control those third parties and we are not responsible for their privacy statements. Their handling of your information is governed by their own privacy policies, not by this one. When you leave the Platform, we encourage you to read the privacy policy of every website and service you use.



SECTION 15

Changes to this policy

We keep this privacy policy under regular review, and we may update it from time to time to reflect changes in our practices, our technology or the law. When we make material changes we will update the effective date shown at the front of this policy and, where required, notify you. Your continued use of the Platform after an update means you accept the revised policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us — for example a new address or email address.

SECTION 16

Regional disclosures

Nigeria — Nigeria Data Protection Act 2023

If you are in Nigeria, we process your personal data in accordance with the Nigeria Data Protection Act 2023 and the directives made under it. You have the rights described in Section 11. You may contact us using the details in Section 17, or lodge a complaint with the Nigeria Data Protection Commission. Transfers of your personal data out of Nigeria are handled as described in Section 9.

United States

Depending on your state of residence, you may have rights to access, delete, correct and port your personal information, and to opt out of certain processing. We do not sell personal information and we do not share it for cross-context behavioural advertising. To exercise any applicable right, contact us using the details in Section 17. We will not discriminate against you for exercising your rights.

European Economic Area and United Kingdom

If you are in the EEA or the United Kingdom, the legal bases set out in Section 6 apply, you have the rights set out in Section 11, and you may lodge a complaint with your local supervisory authority. International transfers are handled as described in Section 9.



SECTION 17

How to contact us

If you have questions about this policy or about how we handle your personal data, or if you wish to exercise your rights, please contact us.

EMAIL	legal@afrikars.com
DATA PROTECTION ENQUIRIES	legal@afrikars.com
CONTROLLER	AFRIKARS INC., a Delaware corporation
WEBSITE	www.afrikars.com

AFRIKARS INC.**HOLDING COMPANY AND DATA CONTROLLER · DELAWARE, USA**

1007 N Orange St, Wilmington, Delaware 19801, United States of America

AFRIKARS MOTORS LLC**LICENSED TEXAS DEALER · UNITED STATES OPERATIONS**

11501 Domain Dr, Austin, Texas 78758, United States of America

AFRIKARS.NG LTD**NIGERIAN OPERATING COMPANY · RC 9632671**

15 Abdou Diouf Crescent, Asokoro, FCT, Nigeria



Questions about this policy?

If you have any questions about this policy, about the use of your personal data, or if you wish to exercise your rights, please get in touch.

AFRIKARS INC.

HOLDING COMPANY AND DATA CONTROLLER · DELAWARE, USA
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