

PRIVACY POLICY

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Welcome to Techfrontline Africa.

Techfrontline Africa Limited (“Techfrontline Africa,” “we,” “us,” or “our”) operates the digital publication, community-driven web application, website, and related features accessible via our online platforms (collectively, the “Platform” or the “Services”). Techfrontline Africa is committed to protecting your privacy and ensuring that your personal data is collected and processed securely, transparently, and in strict compliance with applicable data protection laws.

As a digital media platform focused on technology news, analysis, and ecosystem tracking within Africa, we act as a Data Controller under the Nigeria Data Protection Act, 2023 (NDPA). This Privacy Policy explains how we collect, use, store, disclose, and protect your personal data when you visit, browse, register an account, contribute content, or otherwise interact with our Platform.

Please read this Privacy Policy carefully to understand our views and practices regarding your personal data. By clicking 'I Agree', creating an Account, submitting professional contributor details, or actively interacting with our Services, you provide your explicit, affirmative consent to the collection, processing, cross-border transfer, and storage of your personal data as described below. If you do not consent to these practices, you must immediately cease using the Platform or providing your data. This policy should be read in conjunction with our Terms of Service."

1. INFORMATION WE COLLECT

We collect several types of information from and about users of our Platform, depending on the nature of your interaction with our Services:

A. Information You Provide Directly to Us

- **Account Registration Data:** When you sign up for a member, author, or contributor Account, we collect personal details such as your name, email address, chosen username, password, and profile preferences.
- **Contributor and Professional Information:** If you are a journalist, technical writer, or ecosystem contributor submitting articles, long-form analysis, or tutorials, we may collect your biographical information, professional credentials, legal name, corporate affiliation, contact details, social media handles, and relevant portfolio details.
- **Communications and Feedback:** When you submit a story pitch, report an editorial correction, contact our newsroom or support teams, or complete anonymous tip forms, we collect your email address, name, and any information you choose to include in your message.

- **Community Engagement Content:** Any text, commentary, or feedback you submit via our public interactive features—such as article comments, community message boards, or public forums—is collected and processed by us.

B. Information Collected Automatically Through Your Use of the Services

- **Technical and Device Identifiers:** When you access the Platform, our servers automatically log information sent by your web browser or mobile device. This includes your Internet Protocol (IP) address, browser type and version, language preferences, operating system, device type, unique device identifiers, and time-zone settings.
- **Usage and Analytics Data:** We track how you navigate and interact with our Platform, including pages or article detail listings viewed, article reading times, automated story stream configurations, general feed scrolls, click-through rates, and engagement signals or indicators (e.g., likes, follows, saves, and bookmarks).
- **Cookies and Tracking Technologies:** We utilize cookies, web beacons, and similar tracking mechanisms to authenticate sessions, remember your preferences (such as dark mode or layout structures), track aggregate traffic statistics, and deliver optimized digital content. For detailed information, please see Section 6 (Cookies Policy).

C. Information Received from Third Parties

- **Third-Party Integrations:** If you choose to register or log into your Account via a thirdparty single sign-on service (e.g., Google or LinkedIn), we receive authorized profile information from that provider, such as your verified email address and name.
- **Commercial and Advertising Partners:** We may receive high-level, aggregated demographic data, ad-click tracking metrics, or performance analytics from third-party advertising networks (e.g., Google AdSense) or brand partners running sponsored content placements.

2. LAWFUL BASES FOR PROCESSING DATA

Under Section 25 of the Nigeria Data Protection Act (NDPA) 2023, we only process your personal data when we have a valid, legally recognized justification. We rely on the following lawful bases:

- a. **Consent:** You have given clear, explicit consent for us to process your personal data for a specific purpose. On our Platform, this includes but is not limited to:
 - **Editorial Newsletters:** Subscribing to daily/weekly tech ecosystem news briefs by submitting your email address;
 - **Optional Cookies:** Allowing non-essential performance tracking or analytic tools through our automated cookie configurations; or
 - **Contributor Profiles:** Voluntarily uploading a biographical summary, social links, and credentials for public attribution on published articles
- b. **Performance of a Contract:** The processing is necessary to fulfill our obligations under a

contract to which you are a party, or to take steps at your request before entering into a contract (e.g., provisioning an authenticated member profile, executing contributor agreements, maintaining account access tokens, or rendering paid bespoke report services).

- c. **Legitimate Interests:** The processing is necessary for our legitimate business and operational interests, provided they do not override your fundamental rights and privacy interests. Our legitimate interests include monitoring platform security, preventing backend privilege escalation, optimizing algorithmic text/code snippet displays, auditing system performance, and operating a free, ad-supported digital journalism ecosystem.
- d. **Legal Obligation:** The processing is necessary for us to comply with applicable statutory frameworks, regulatory mandates, or judicial directives under Nigerian law.

3. . CONSENT MANAGEMENT, GRANULARITY, AND WITHDRAWAL

We ensure that user consent is freely given, specific, and fully informed. You retain absolute control over your optional data processing preferences:

- **Withdrawing Marketing Consent:** Every promotional email or newsletter dispatched by Techfrontline Africa contains an explicit ‘Unsubscribe’ link at the footer. Clicking this link immediately revokes your consent for that communication stream.
- **Managing Cookie Consent:** You have the right to modify or completely withdraw cookie consent at any time via your web browser settings or through our platform’s preference boxes. Disabling cookies may affect specific authenticated experiences.
- **Revocation and Account Deletion:** If you wish to permanently withdraw your consent for profile storage, you may request account deactivation by contacting our newsroom. Please note that withdrawing consent does not invalidate the lawfulness of any data processing executed prior to your withdrawal.

4. HOW WE USE YOUR INFORMATION

Techfrontline Africa uses the collected information for the following specific editorial, operational, and commercial purposes:

- a. **To Provide and Personalize the Services:** Managing your Account, enabling role-based access configurations, maintaining access tokens, tracking personalized engagement signals (saves, bookmarks, follows), and dynamically populating content feeds.
- b. **To Manage Contributors and Editorial Submissions:** Reviewing story pitches, publishing author attributions, validating copyright clearances, formatting submissions, and maintaining professional legal records of editorial intellectual property.
- c. **To Maintain System Security and Integrity:** Monitoring backend infrastructure, analyzing server logs, preventing unauthorized access tokens, defending against malicious bot activities, detecting security vulnerability testing, and blocking unauthorized attempts at account privilege escalation.

- d. To Facilitate Commercial and Promotional Operations: Displaying contextually relevant advertisements, tracking sponsored post engagement, managing brand partnership metrics, and verifying campaign performance in accordance with consumer protection guidelines.
- e. To Communicate with You: Responding to customer support tickets, editorial corrections, corporate inquiries, and delivering vital platform security updates or legal notices.
- f. To Conduct Aggregated Research and Data Analytics: Reviewing general platform traffic trends, evaluating reading times across content categories, and tracking systemic usage data to improve our news delivery mechanisms.

5. HOW WE SHARE AND DISCLOSE YOUR DATA

We do not sell, rent, or trade your personally identifying data to third-party commercial entities. We only share your personal data in the limited circumstances described below:

- a. Publicly Displayed Author and User Attributes: If you register as an author or contributor, your provided bio, professional name, social media links, and publication metadata will be visible to the general public on your article listings and detail pages. Similarly, any comments or forum entries you post publicly are visible to all Platform visitors.
- b. Third-Party Service Providers: We share necessary data payloads with trusted vendors who perform operational tasks on our behalf. These include cloud infrastructure and web hosting services, database management providers, automated analytics systems, email newsletter dispatch services, and payment processors. These providers are bound by strict contractual confidentiality clauses and are prohibited from using your data for any independent purpose.
- c. Commercial and Advertising Networks: We work with digital advertising brokers (such as Google AdSense) to display programmatic advertisements. While these networks may deploy tracking cookies to measure aggregate ad delivery, we do not transmit unmasked personal identification data (e.g., your legal name or email address) to them.
- d. Corporate Restructuring and Asset Transfers: In the event that Techfrontline Africa undergoes a material corporate transition—such as a merger, acquisition, joint venture, restructuring, divestiture, or sale of company assets—user and contributor records may be transferred to the successor entity as part of the operational asset inventory.
- e. Compliance with Law and Law Enforcement: We may disclose personal data if strictly required to do so by a court of competent jurisdiction, statutory regulatory bodies (such as the Nigeria Data Protection Commission), or law enforcement agencies executing valid legal processes under the Cybercrimes Act or other applicable legislations.

6. REVENUE MECHANISMS, ADVERTISING, AND COMPLIANCE

Techfrontline Africa operates as a commercial digital news and media enterprise. To sustain our operations and fund original journalistic activities, we utilize several commercial mechanisms:

- a. Programmatic and Display Advertising: We place advertising blocks across our general feeds, article listings, and post detail screens. Third-party ad vendors utilize aggregate, non-identifiable usage signals to measure ad performance.
- b. Sponsored Content and Brand Partnerships: We partner with corporate entities to publish sponsored articles, ecosystem spotlights, and branded research reports. All such content is visibly identified and labeled.
- c. Regulatory Compliance Obligations: In running advertising and brand promotional materials, we ensure that third-party placements comply with the Federal Competition and Consumer Protection Act (FCCPA) and the regulatory codes of the Advertising Regulatory Council of Nigeria (ARCON). Advertisers are contractually required to maintain accuracy and lawfulness in all promotional copy and linked landing domains.

7. COOKIES AND TRACKING TECHNOLOGIES

We use cookies and similar technologies to ensure our Platform functions reliably and efficiently.

- a. Essential Cookies: These are technically necessary to maintain authenticated experiences, process role-based access tokens, protect backend APIs, and keep your account session secure. The Platform cannot function properly without these.
- b. Functional and Preference Cookies: These allow our application to remember your chosen layout configurations, text sizes, reading mode setups, and bookmark states.
- c. Analytical and Performance Cookies: Deployed by third-party tools (such as Google Analytics), these compile anonymous, aggregated metrics on site referrals, page views, bounce rates, and total user paths. We use this data strictly to optimize our editorial performance and user experience.

You can modify your browser settings to decline cookies or alert you when a cookie is being transmitted. However, if you disable all cookies, significant portions of our authenticated member services, contributor tools, and account-based features may cease to function correctly.

8. DATA RETENTION AND EXTRA-TERRITORIAL TRANSFERS

A. Data Retention Policy

We will retain your personal data only for as long as is strictly necessary to fulfill the specific processing purposes outlined in this Privacy Policy, including our statutory legal, accounting, tax, or reporting requirements.

- Account-based identification profiles and contributor credentials are retained for the active lifecycle of your account.
- If an account is deactivated or terminated, we may retain certain authentication log records, metadata fields, and historical article attribution markers in an anonymized or aggregated state to maintain platform archive integrity and backend security audits.

B. Cross-Border Data Transfers

Techfrontline Africa relies on global cloud architecture, content delivery networks (CDNs), and distributed data hosting infrastructure. Consequently, the information we collect may be transmitted to, stored in, or processed in jurisdictions outside the Federal Republic of Nigeria.

Whenever we transfer your personal data outside of Nigeria, we ensure it receives a comparable and adequate level of legal protection by verifying that:

- The destination country possesses an advanced data protection regulatory environment validated by the NDPC; or
- The cross-border transfer is bound by standard contractual clauses, robust binding corporate rules, and strict technical encryption standards that provide equivalent safeguards under the NDPA 2023.

8. DATA SECURITY AND SYSTEM SAFEGUARDS

Techfrontline Africa employs comprehensive, commercially reasonable technical and organizational security measures to protect your personal data against accidental loss, unauthorized alteration, theft, misuse, or unauthorized processing. Our defense mechanisms include:

- **Transport Layer Encryption:** Deploying Secure Socket Layer/Transport Layer Security (SSL/TLS) protocols to encrypt all data payloads transmitted between your web browser and our backend systems.
- **Role-Based Authentication Access:** Implementing restricted cryptographic access tokens that prevent privilege escalation and ensure that only verified administrative, editorial, or contributor personnel can access backend database tables.
- **Infrastructure Audits:** Conducting systematic infrastructure reviews and data minimization protocols to restrict internal employee access to unmasked user data tables.

Please note, however, that no method of electronic storage or digital transmission over the public internet can be guaranteed to be absolutely secure. While we deploy cutting-edge security architecture, our liability for data breaches or systemic backend failures is governed by the liability caps set forth in our Terms of Service.

9. YOUR LEGAL PRIVACY RIGHTS

As a data subject under the Nigeria Data Protection Act (NDPA) 2023, you possess robust, legally enforceable rights regarding how your personal information is handled. You can exercise the following rights at any time:

- **Right of Access:** You have the right to request clear confirmation as to whether we are processing your personal data, and to obtain a copy of the specific pieces of data we hold about you.

- **Right to Rectification:** You have the right to request that we immediately correct any inaccurate, outdated, incomplete, or misleading personal information associated with your account profile.
- **Right to Erasure (Right to be Forgotten):** You have the right to request the permanent deletion of your personal data from our databases, subject to certain exceptions (such as when we must retain the data to comply with a statutory legal obligation or preserve public interest journalistic archives).
- **Right to Restrict Processing:** You have the right to block or suspend the processing of your data under specific scenarios—for instance, if you contest the accuracy of the underlying data while we are verifying it.
- **Right to Data Portability:** You have the right to request that we compile your account profile data into a structured, commonly used, and machine-readable format, and transfer it to another data controller where technically feasible.
- **Right to Object:** You have the right to object to the processing of your data based on our legitimate interests or for direct digital marketing purposes.
- **Right to Withdraw Consent:** Where our processing is explicitly grounded upon your voluntary consent, you have the right to withdraw that consent at any time without affecting the lawfulness of our processing prior to the withdrawal.

To exercise any of these privacy rights, please submit a formal, verifiable request to our newsroom using the contact details provided in Section 11. We will verify your identity before executing any request and aim to respond within thirty (30) days.

10. CHANGES TO THIS PRIVACY POLICY

Techfrontline Africa reserves the right to amend, update, or completely revise this Privacy Policy at any time to reflect updates to our digital features, technical data flows, corporate restructuring, or changes in statutory legislations.

Any modifications made to this policy will be published on this page, and the "Effective Date" and "Last Updated" timestamps at the top of the document will be updated accordingly. For material alterations that significantly expand how we collect or disclose your personal data, we will provide a prominent notification via platform notification boxes or a direct email announcement. Your continued use of the Platform after the posting of a revised policy constitutes your acknowledgement of the updated terms.

11. CONTACT US AND COMPLAINTS MECHANISM

If you have any questions, clarifications, feedback, or observations regarding this Privacy Policy, or if you wish to formally exercise your legal rights under the NDPA 2023, please contact us at:

Techfrontline Africa Limited Email:

Registered Corporate Office:

Website URL:

If you believe that Techfrontline Africa has processed your personal data in a manner that infringes your statutory privacy rights, or if we fail to resolve an inquiry to your satisfaction, you have the right to lodge a formal complaint with the appropriate supervisory regulatory body:

- Nigeria Data Protection Commission (NDPC) Website: www.ndpc.gov.ng