

CARBONEX APPS DATA PRIVACY POLICY

CarbonEx User App & CarbonEx Vendor App

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1. INTRODUCTION

CarbonEx Agro Trading Nig. Ltd. ("**CarbonEx**", "**we**", "**us**", or "**our**") is committed to protecting the privacy, security, confidentiality and lawful use of personal data entrusted to us through the CarbonEx digital ecosystem.

This Data Privacy Policy ("**Privacy Policy**") explains how CarbonEx collects, receives, records, stores, uses, analyses, shares, protects, transfers, retains and otherwise processes personal data through:

1. the **CarbonEx User App**;
2. the **CarbonEx Vendor App**;
3. CarbonEx websites and web-based services;
4. CarbonEx smart energy and clean-cooking technologies;
5. CarbonEx-enabled IoT devices, sensors and telemetry systems;
6. CarbonEx digital wallets and payment infrastructure;
7. CarbonEx climate-finance, carbon-credit and reward systems;
8. CarbonEx logistics and energy-distribution systems;
9. CarbonEx artificial intelligence ("AI"), analytics and forecasting systems; and
10. related CarbonEx services, platforms, APIs, databases and technology infrastructure.

The CarbonEx Apps are designed to facilitate access to energy and clean-energy services while enabling digital payments, energy monitoring, emissions measurement, climate-finance participation, rewards, energy logistics and data-driven energy access.

Because CarbonEx operates technology that can connect a user's identity with energy transactions, energy consumption, location, payments, emissions information, rewards and digital wallets, we recognise that some of the information processed through our Apps can be particularly sensitive from a privacy and security perspective.

We therefore seek to apply the principles of lawful, fair, transparent, purpose-limited, proportionate, secure and accountable data processing.

This Privacy Policy applies to both individual users and businesses using the CarbonEx Apps, including households, customers, energy users, gas vendors, distributors, agents and other authorised participants in the CarbonEx ecosystem.

By creating an account, accessing or using the CarbonEx Apps, you acknowledge that you have been provided with this Privacy Policy. Where consent is required by applicable law, CarbonEx will obtain consent through an appropriate affirmative action.

2. ABOUT CARBONEX

CarbonEx Agro Trading Nig. Ltd. operates a climate-finance and energy-technology platform designed to connect energy access, clean cooking, digital payments, energy intelligence, emissions measurement and climate-finance mechanisms.

The CarbonEx ecosystem may enable users to:

- purchase or request LPG and other supported energy products;
- purchase electricity or other supported energy services;
- make and receive digital payments;
- monitor energy consumption;
- receive real-time or near-real-time energy information;
- monitor or estimate associated greenhouse-gas emissions;
- participate in clean-energy and climate-finance programmes;
- receive rewards, points, carbon-related benefits or digital assets;
- maintain digital wallets;
- interact with vendors and energy suppliers;
- request or track energy deliveries and refills;
- use location-enabled logistics services;
- access personalised energy information;
- receive energy-demand or affordability recommendations;
- interact with CarbonEx's AI-powered energy and emissions intelligence systems; and
- participate in future or existing tokenized energy, climate or reward ecosystems supported by CarbonEx.

For vendors, the CarbonEx Vendor App may additionally facilitate:

- customer and order management;
- energy sales and fulfilment;
- refill and delivery management;
- vendor wallet management;
- payment settlement;
- transaction reconciliation;

- energy-demand intelligence;
- customer-service operations;
- logistics coordination;
- energy-consumption analytics;
- carbon and emissions data generation;
- operational performance monitoring; and
- participation in CarbonEx's climate-finance and energy-data ecosystem.

3. DATA CONTROLLER

For personal data processed through the CarbonEx Apps, **CarbonEx Agro Trading Nig. Ltd.** generally acts as the data controller where CarbonEx determines the purposes and means of processing personal data.

CarbonEx may also act as a data processor where it processes personal data strictly on behalf of another organisation under applicable contractual or legal arrangements.

CarbonEx Agro Trading Nig. Ltd.

Company: CarbonEx Agro Trading Nig. Ltd.

Registration: RC2018158

Location: Nigeria

Email: carbonexafrica@gmail.com

Where CarbonEx appoints a Data Protection Officer, Data Protection Compliance Organisation or other designated privacy contact, the relevant contact details may be provided through the App, website or an updated version of this Privacy Policy.

4. OUR DATA PROTECTION PRINCIPLES

CarbonEx seeks to process personal data in accordance with applicable data-protection law and the following principles:

4.1 Lawfulness, fairness and transparency

We process personal data on an appropriate lawful basis and seek to explain clearly what information we collect, why we collect it and how it is used.

4.2 Purpose limitation

We collect and process information for specified, legitimate and disclosed purposes and seek not to use personal data for incompatible purposes.

4.3 Data minimisation

We seek to collect information that is adequate, relevant and reasonably necessary for the service, transaction, security or operational purpose for which it is processed.

4.4 Accuracy

We seek to maintain accurate and reasonably up-to-date information and provide mechanisms for users to correct relevant personal information.

4.5 Storage limitation

We retain personal data only for as long as reasonably necessary for the purposes for which it was collected, unless a longer retention period is required or permitted by law.

4.6 Security and confidentiality

We apply appropriate technical, organisational and administrative safeguards designed to protect personal data against unauthorised access, disclosure, alteration, destruction, loss or misuse.

4.7 Accountability

CarbonEx seeks to maintain appropriate governance, records, policies, access controls, security procedures and privacy practices demonstrating responsible data processing.

These principles are consistent with the data-processing principles identified by the Nigeria Data Protection Commission under the Nigeria Data Protection Act 2023.

5. TYPES OF USERS COVERED BY THIS POLICY

Depending on how you interact with CarbonEx, you may be:

5.1 User App customer

A household, individual or other energy consumer using the CarbonEx User App to purchase energy, monitor consumption, receive services, make payments or participate in CarbonEx's rewards and climate-finance ecosystem.

5.2 Vendor App user

An LPG vendor, energy vendor, distributor, delivery partner, agent, merchant, operator or other authorised business user operating through the CarbonEx Vendor App.

5.3 Connected-device user

A person whose household, energy appliance, smart cookstove, meter, sensor or other connected energy device sends information into the CarbonEx ecosystem.

5.4 Programme participant

A person participating in a CarbonEx clean-energy, climate-finance, carbon-credit, subsidy, rewards, research, pilot, community or other programme.

6. INFORMATION WE COLLECT

The information CarbonEx collects depends on the services you use, the permissions you grant, the transactions you perform and the devices or energy technologies connected to your account.

We may collect the following categories.

6.1 Identity and account information

When you create or maintain a CarbonEx account, we may collect:

- full name;
- username;
- account ID;
- phone number;
- email address;
- password or authentication credentials;
- date of birth where required for a particular service;
- residential or business address;

- profile photograph where voluntarily provided;
- account type;
- customer or vendor status;
- referral information;
- account preferences;
- security settings; and
- other information necessary to establish and maintain your account.

Why we collect this information

We use identity and account information to:

- create and manage your CarbonEx account;
- authenticate you;
- communicate with you;
- provide energy services;
- process transactions;
- associate energy transactions with the correct customer or vendor;
- prevent fraud and unauthorised access;
- provide customer support;
- comply with legal and regulatory requirements; and
- maintain the security and integrity of the CarbonEx ecosystem.

7. CONTACT INFORMATION

We may collect:

- telephone numbers;
- email addresses;
- delivery addresses;
- service addresses;
- business addresses;
- emergency or operational contact details where relevant;
- communication preferences; and
- contact information supplied by a vendor or customer in connection with an order or service.

We use this information to communicate about:

- orders;
- gas refills;
- electricity purchases;

- payments;
- deliveries;
- account activity;
- service interruptions;
- security alerts;
- rewards;
- climate-finance programmes;
- customer support; and
- other services requested by you.

8. LOCATION DATA

Because CarbonEx operates an energy-access and logistics platform, location information can be an important component of our services.

Depending on your permissions, device configuration and the service being used, CarbonEx may process:

- precise GPS location;
- approximate location;
- delivery location;
- household/service location;
- vendor location;
- transaction location;
- route or logistics location;
- location associated with an energy device;
- location associated with an order;
- IP-derived approximate location; and
- geospatial information generated through connected devices or infrastructure.

Why location data is used

Location information may be used to:

1. identify the service area associated with an account;
2. facilitate gas delivery and refill logistics;
3. connect customers with nearby vendors;
4. support energy availability and distribution;
5. estimate logistics requirements;
6. monitor delivery progress;
7. improve delivery routing;

8. associate energy consumption with an appropriate geographic location;
9. support emissions measurement and climate-impact calculations;
10. identify local energy demand;
11. forecast energy requirements by geographic area;
12. reduce delivery delays and operational costs;
13. support fraud and transaction-security controls;
14. improve energy affordability and access; and
15. generate aggregated or anonymised energy-market intelligence.

Location permissions

Where an App requires access to location information from your mobile device, the App may request permission through your device's operating system.

You may generally disable location permissions through your device settings. However, certain features, particularly location-dependent logistics, delivery, vendor matching or energy services, may not function correctly without location information.

CarbonEx will seek to avoid collecting precise location information where a less precise location is sufficient for the particular purpose.

9. ENERGY CONSUMPTION AND ENERGY USAGE DATA

Energy data is a fundamental component of the CarbonEx ecosystem.

Depending on the service you use, CarbonEx may collect or receive:

- LPG consumption;
- estimated LPG consumption;
- electricity consumption;
- electricity purchase amounts;
- electricity token or vending information;
- energy quantity;
- kWh information;
- gas quantity;
- refill quantity;
- energy usage frequency;
- energy purchase frequency;
- energy consumption timestamps;

- appliance or device readings;
- smart cookstove information;
- meter information;
- energy transaction history;
- energy-demand patterns;
- energy-use duration;
- refill frequency;
- consumption trends;
- energy affordability information;
- energy-service interruptions; and
- related telemetry.

Why we collect energy data

Energy data enables CarbonEx to:

- provide real-time or near-real-time energy monitoring;
- help users understand their energy consumption;
- facilitate energy purchasing;
- identify consumption patterns;
- provide energy-use insights;
- calculate or estimate emissions;
- generate climate-impact measurements;
- improve energy access;
- forecast future energy demand;
- optimise energy distribution;
- improve LPG refill logistics;
- support carbon-credit and climate-finance processes;
- determine eligibility for certain rewards or programmes;
- generate verified energy-data records; and
- improve CarbonEx's energy intelligence systems.

Energy data may be associated with an account or device where necessary to provide personalised services.

10. SMART COOKSTOVE AND IOT TELEMETRY DATA

Where a CarbonEx-enabled smart cookstove, sensor, meter, energy device or other connected technology is used, CarbonEx may receive machine-generated information.

Depending on the device and configuration, this may include:

- device ID;
- sensor ID;
- pressure measurements;
- energy measurements;
- consumption measurements;
- timestamps;
- device status;
- battery status;
- connectivity status;
- network information;
- signal strength;
- GPS information where enabled;
- device diagnostics;
- operating status;
- sensor readings;
- appliance activity;
- refill or usage events; and
- other telemetry necessary to operate the connected-energy service.

CarbonEx may combine telemetry with account, transaction and location information to produce a more complete picture of energy use.

Purpose of telemetry

Telemetry may be used to:

- monitor energy consumption;
- detect usage events;
- identify abnormal device conditions;
- improve device reliability;
- support maintenance;
- facilitate energy-demand forecasting;
- measure energy and emissions;
- support carbon accounting;
- validate climate-impact claims;
- improve energy access;
- detect fraud or manipulation;
- generate energy-data assets; and
- improve CarbonEx's technology.

11. EMISSIONS AND CLIMATE-IMPACT DATA

CarbonEx may calculate, estimate, monitor or otherwise process data relating to greenhouse-gas emissions and climate impact.

Such information may include:

- estimated CO₂ or CO₂-equivalent emissions;
- emissions avoided;
- baseline energy use;
- post-intervention energy use;
- clean-energy adoption;
- fuel displacement;
- LPG usage;
- electricity consumption;
- clean-cooking activity;
- energy efficiency information;
- carbon-credit-related measurements;
- monitoring, reporting and verification ("MRV") data;
- digital MRV ("dMRV") records;
- climate-impact indicators;
- carbon-credit generation data;
- verification status; and
- information used to calculate environmental impact.

These calculations may use information from:

- your energy transactions;
- connected devices;
- smart cookstoves;
- meters;
- location;
- timestamps;
- energy quantities;
- fuel information;
- electricity information;
- approved methodologies;
- third-party energy providers;
- CarbonEx measurement systems; and
- other relevant technical sources.

CarbonEx may process these datasets to generate **aggregated, pseudonymised or anonymised environmental and energy information** for climate-finance, reporting, research, analytics and other legitimate purposes.

12. CARBON CREDITS AND CLIMATE-FINANCE DATA

CarbonEx may operate or participate in mechanisms through which verified energy and environmental activity contributes to climate-finance or carbon-credit programmes.

For these purposes, we may process:

- energy-use records;
- emissions information;
- emissions-reduction estimates;
- project identifiers;
- household participation information;
- programme participation;
- verification records;
- monitoring data;
- environmental-impact information;
- carbon-credit allocation information;
- reward eligibility information;
- payment information;
- wallet identifiers; and
- transaction records.

CarbonEx may provide relevant information to authorised carbon registries, verification bodies, climate-finance partners, project partners or other entities where necessary to establish, verify, issue, administer, transfer or report climate-related assets or benefits.

Where environmental data is aggregated or anonymised so that individuals can no longer reasonably be identified, CarbonEx may use that information for analytics, research, climate modelling, reporting and commercial purposes.

13. PAYMENT INFORMATION

CarbonEx Apps may integrate with banks, payment gateways, mobile-money providers, fintech companies, card processors, electricity-vending providers and other authorised payment-service providers.

Depending on the payment method, we may process:

- payment amount;
- transaction reference;
- payment status;
- payment date and time;
- currency;
- payment method;
- payer or recipient information;
- merchant/vendor information;
- wallet identifier;
- bank or financial institution information;
- payment-provider reference;
- electricity vending information;
- gas purchase information;
- refund information;
- settlement information;
- transaction history; and
- fraud or transaction-security information.

Payment-card information

Where a third-party payment provider processes card information, sensitive payment-card credentials may be collected and processed directly by the relevant payment provider rather than CarbonEx.

CarbonEx does not intend to unnecessarily store complete payment-card credentials where the payment service can securely process the transaction without CarbonEx retaining those credentials.

Third-party payment providers may have their own privacy notices and terms governing their processing.

14. CARBONEX FIAT WALLET

The CarbonEx Apps may provide digital wallets used for energy-related transactions.

Depending on the App and account type, wallet functionality may include:

- deposits;
- transfers;
- energy purchases;
- gas refill payments;
- electricity purchases;
- vendor settlement;
- transaction history;
- rewards;
- promotional credits;
- subsidies;
- wallet balances;
- settlement records; and
- other supported transactions.

CarbonEx may maintain separate wallet structures or transaction accounts for customers and vendors.

For example, a customer wallet may be restricted to permitted energy-related transactions, while a vendor wallet may support settlement, transfers or withdrawal functions according to the applicable service design and regulatory requirements.

15. WEB3 WALLET AND TOKENIZED ASSETS

CarbonEx may provide or integrate with Web3 wallets, blockchain networks and tokenized digital assets.

These may include wallet addresses, blockchain transaction identifiers, token balances, token transactions and other blockchain-related information.

Where blockchain technology is used, information such as:

- wallet addresses;
- transaction hashes;
- token balances;
- token transfers;
- timestamps;
- blockchain network information;
- asset identifiers;
- verification records;
- smart-contract information; and

- transaction status

may be recorded on a public or distributed ledger.

Important blockchain privacy consideration

Blockchain networks may be inherently transparent and may not permit information to be deleted, altered or removed after publication.

Accordingly, CarbonEx seeks to avoid unnecessarily placing directly identifying personal information on public blockchains.

Where appropriate, CarbonEx may instead maintain sensitive personal information and raw operational information off-chain while using blockchain technology for identifiers, hashes, verification records, transaction references or other limited technical records.

A blockchain wallet address may not directly reveal your identity; however, when combined with other information, a wallet address may potentially become associated with an identifiable person.

You should therefore treat blockchain transactions as potentially traceable and understand that CarbonEx cannot guarantee the deletion of information that has already been recorded on a public or decentralised blockchain operated by third parties.

16. REWARDS, POINTS AND DIGITAL ASSETS

CarbonEx may operate reward mechanisms associated with:

- clean-energy adoption;
- LPG purchases;
- electricity purchases;
- energy efficiency;
- verified energy activity;
- climate-impact participation;
- referrals;
- programme participation;
- verified consumption;
- carbon-credit activity; or
- other qualifying actions.

To administer these mechanisms, CarbonEx may process:

- account information;
- transaction history;
- energy data;
- emissions data;
- wallet information;
- reward points;
- token balances;
- programme information; and
- eligibility information.

Rewards may be subject to separate programme terms.

Nothing in this Privacy Policy constitutes an offer, guarantee or representation concerning the financial value, liquidity, exchangeability or future value of any token or digital asset.

17. GAS LOGISTICS AND DELIVERY INFORMATION

Where CarbonEx facilitates LPG or other energy delivery, we may process:

- customer name;
- telephone number;
- delivery address;
- location;
- order details;
- quantity requested;
- energy type;
- refill history;
- vendor information;
- delivery status;
- driver or agent information;
- delivery timestamps;
- route information;
- proof-of-delivery information;
- payment status;
- service preferences; and
- customer-vendor communications relating to the order.

This information is used to coordinate energy delivery, connect customers and vendors, estimate demand, optimise logistics and improve energy access.

18. VENDOR DATA

The CarbonEx Vendor App may collect information about vendors and authorised vendor representatives, including:

- vendor name;
- business name;
- business address;
- telephone number;
- email address;
- business registration information;
- identity verification information;
- authorised representative information;
- payment and settlement information;
- wallet information;
- transaction history;
- customer orders;
- energy inventory information;
- gas sales information;
- location;
- delivery information;
- operational activity;
- device information;
- performance information;
- fraud-prevention information;
- customer-service records; and
- information required for legal, regulatory or contractual compliance.

Vendor information is used to operate the CarbonEx marketplace and energy-distribution ecosystem.

19. DEVICE AND TECHNICAL INFORMATION

When you use the CarbonEx Apps, we may automatically receive technical information such as:

- device model;
- device manufacturer;
- operating system;
- operating-system version;
- App version;
- unique device identifiers;
- IP address;
- mobile network information;
- internet connection information;
- language;
- time zone;
- device settings;
- crash information;
- diagnostic information;
- performance information;
- session information;
- authentication events;
- security events; and
- App interaction information.

Why we collect technical information

Technical information helps us:

- provide the Apps;
- maintain security;
- detect suspicious activity;
- diagnose errors;
- troubleshoot problems;
- prevent fraud;
- understand system performance;
- improve App reliability;
- deliver updates; and
- protect users and CarbonEx infrastructure.

20. APP ACTIVITY AND USAGE DATA

We may collect information about how you interact with CarbonEx Apps, including:

- pages or screens viewed;
- features used;
- transactions initiated;
- buttons or functions accessed;
- session duration;
- login events;
- failed login attempts;
- search or service requests;
- notifications delivered;
- settings changed;
- errors encountered;
- customer-support interactions; and
- other interaction information.

This information helps CarbonEx understand whether services are working properly and improve the user experience.

21. AI, MACHINE LEARNING AND AUTOMATED PROCESSING

Artificial intelligence and analytical technologies form part of CarbonEx's energy-intelligence infrastructure.

CarbonEx may use AI, machine learning, statistical modelling and automated analytics to analyse:

- energy consumption;
- energy transactions;
- gas demand;
- electricity demand;
- geographic demand;
- delivery patterns;
- energy availability;
- refill behaviour;
- consumption trends;
- emissions data;
- device telemetry;
- logistics information;
- vendor activity;
- transaction information; and

- aggregated or pseudonymised user information.

AI may be used for:

- energy-demand forecasting;
- gas-demand forecasting;
- electricity-demand forecasting;
- inventory planning;
- logistics optimisation;
- energy-access planning;
- affordability analysis;
- emissions estimation;
- anomaly detection;
- fraud detection;
- device diagnostics;
- energy-consumption insights;
- climate-impact measurement;
- service personalisation; and
- operational decision support.

Automated decision-making

Where CarbonEx uses automated systems to make or materially influence decisions that may significantly affect an individual, CarbonEx will provide appropriate information and safeguards required by applicable law.

Where required, users may have rights to:

- request information about relevant automated processing;
- challenge certain automated decisions;
- request appropriate human intervention; and
- object to applicable automated processing.

The NDPA expressly requires transparency regarding automated decision-making, including profiling, and provides relevant data-subject protections.

CarbonEx does not intend to use AI to make decisions about individuals based on sensitive personal characteristics where such processing is unlawful or unnecessary.

22. ENERGY DEMAND FORECASTING

CarbonEx may analyse historical and near-real-time information to forecast energy demand.

Demand forecasting may consider:

- location;
- historical purchases;
- energy consumption;
- refill frequency;
- electricity purchases;
- time of day;
- day of week;
- seasonal trends;
- geographic demand;
- vendor availability;
- energy inventory;
- delivery activity;
- aggregated customer behaviour; and
- other relevant operational data.

The objective is to improve:

- energy availability;
- supply planning;
- gas distribution;
- vendor inventory management;
- delivery efficiency;
- affordability;
- customer experience; and
- energy-access planning.

Where feasible, CarbonEx may use aggregated or pseudonymised information for regional demand modelling rather than relying on directly identifiable information.

23. ENERGY AND EMISSIONS INTELLIGENCE

CarbonEx may combine information from different sources to create energy intelligence.

For example, CarbonEx may combine:

User account + energy transaction + device telemetry + location + timestamp + consumption information

to determine or estimate:

- energy consumption;
- energy demand;
- emissions;
- avoided emissions;
- energy-use trends;
- climate impact;
- refill requirements; and
- energy-access patterns.

This combination allows CarbonEx to provide services that would not be possible using account or payment data alone.

24. HOW WE USE PERSONAL DATA

Subject to applicable law, CarbonEx may process personal data to:

1. create and manage accounts;
2. authenticate users;
3. provide energy services;
4. process payments;
5. process gas and electricity purchases;
6. manage wallets;
7. facilitate vendor settlements;
8. coordinate energy deliveries;
9. monitor energy consumption;
10. measure or estimate emissions;
11. generate climate-impact information;
12. administer rewards;
13. administer climate-finance programmes;
14. support carbon-credit activities;
15. operate dMRV systems;
16. operate connected devices;
17. forecast energy demand;
18. improve energy affordability and access;
19. optimise logistics;
20. detect fraud;
21. prevent abuse;
22. secure accounts;
23. troubleshoot technical problems;

24. provide customer support;
25. analyse App performance;
26. improve CarbonEx products;
27. conduct research and development;
28. generate aggregated energy-market intelligence;
29. comply with applicable laws;
30. respond to lawful requests from authorities;
31. enforce contractual terms;
32. protect CarbonEx, users and third parties;
33. investigate security incidents;
34. resolve disputes;
35. maintain financial and transaction records; and
36. perform other purposes disclosed to you at the point of collection or otherwise permitted by law.

25. LEGAL BASES FOR PROCESSING

Depending on the circumstances, CarbonEx may process personal data on one or more lawful bases recognised under applicable law.

These may include:

25.1 Performance of a contract

Where processing is necessary to provide a service requested by you.

Examples include:

- creating an account;
- processing an energy purchase;
- delivering gas;
- managing a wallet;
- processing vendor settlement;
- providing energy monitoring.

25.2 Consent

Where applicable law requires consent or where CarbonEx chooses to rely on consent.

Examples may include certain:

- location permissions;

- optional communications;
- optional marketing;
- optional programme participation;
- optional device permissions.

Where processing is based on consent, you may withdraw consent subject to applicable legal and operational limitations.

25.3 Legal obligation

Where CarbonEx is required to process information to comply with applicable laws, regulations, court orders, regulatory requirements or other lawful obligations.

25.4 Legitimate interests

Where applicable law permits processing based on legitimate interests, CarbonEx may process information necessary for purposes such as:

- security;
- fraud prevention;
- service improvement;
- operational analytics;
- network protection;
- product development;
- business administration.

Where legitimate interests are relied upon, CarbonEx will consider the rights and interests of affected individuals.

25.5 Vital interests

Where processing is necessary to protect a person's life or safety in circumstances recognised by applicable law.

25.6 Public interest or other lawful bases

Where recognised under applicable Nigerian law or another applicable legal framework.

26. WHEN WE SHARE PERSONAL DATA

CarbonEx does not treat personal data as a commodity to be freely sold.

We may disclose or provide access to personal data where reasonably necessary to operate our services, fulfil transactions, comply with law, protect users or pursue other lawful purposes.

Recipients may include:

- payment processors;
- banks and financial institutions;
- mobile-money providers;
- electricity vending providers;
- LPG suppliers;
- gas vendors;
- delivery partners;
- logistics providers;
- cloud service providers;
- hosting providers;
- analytics providers;
- cybersecurity providers;
- telecommunications providers;
- IoT connectivity providers;
- technology partners;
- carbon-credit partners;
- climate-finance partners;
- verification and validation providers;
- auditors;
- professional advisers;
- legal advisers;
- regulators;
- government authorities;
- courts;
- law-enforcement agencies where legally authorised; and
- other service providers acting under appropriate contractual or legal arrangements.

27. CUSTOMER-VENDOR DATA SHARING

Because CarbonEx facilitates energy transactions between customers and vendors, certain information may need to be shared between the relevant parties.

For example, when a customer requests an LPG delivery, the relevant vendor may need to receive:

- customer name;

- delivery location;
- telephone number;
- order information;
- quantity requested;
- payment status; and
- information necessary to fulfil the delivery.

Similarly, customers may receive relevant vendor information necessary to identify or communicate with the vendor responsible for their order.

CarbonEx seeks to limit such disclosure to information reasonably necessary for the relevant transaction or service.

28. THIRD-PARTY SERVICE PROVIDERS

CarbonEx may use third-party infrastructure to provide parts of the CarbonEx ecosystem.

Examples may include:

- cloud hosting;
- databases;
- payment gateways;
- telecommunications networks;
- SMS providers;
- email providers;
- push-notification services;
- analytics infrastructure;
- identity verification services;
- blockchain networks;
- electricity-vending platforms;
- mapping or location services;
- cybersecurity providers;
- AI infrastructure; and
- other technology providers.

Where appropriate, CarbonEx seeks to require service providers that process personal data on its behalf to implement appropriate confidentiality, security and data-protection obligations.

Third-party services may have separate privacy policies.

29. INTERNATIONAL DATA TRANSFERS

Some CarbonEx technology providers, infrastructure providers, blockchain networks, cloud services or business partners may operate outside Nigeria.

Where personal data is transferred across borders, CarbonEx will seek to apply appropriate safeguards required by applicable data-protection law.

These safeguards may include:

- contractual protections;
- adequacy mechanisms where available;
- approved transfer mechanisms;
- security controls;
- data minimisation;
- encryption;
- pseudonymisation; and
- other legally recognised safeguards.

Where applicable law requires specific consent, notice or regulatory approval for an international transfer, CarbonEx will seek to comply with that requirement.

30. BLOCKCHAIN AND DECENTRALISED NETWORKS

CarbonEx may use blockchain infrastructure for certain tokenised assets, rewards, verification records, digital identities or transaction records.

Because blockchain networks can be decentralised and may be operated by independent third parties, CarbonEx may not control:

- the blockchain network;
- independent blockchain validators;
- public ledger availability;
- historical blockchain records;
- blockchain transaction visibility; or
- the ability to delete or modify information already published to a blockchain.

Accordingly, users should understand that certain blockchain information may remain publicly accessible after a transaction.

CarbonEx seeks to minimise privacy risks by limiting the amount of personally identifying information placed directly on-chain.

31. DATA AGGREGATION, PSEUDONYMISATION AND ANONYMISATION

CarbonEx may create aggregated, pseudonymised or anonymised datasets from information collected through its Apps.

Pseudonymised data

Pseudonymisation involves replacing direct identifiers with identifiers that reduce the direct association between data and an individual while retaining the ability to link the information where authorised.

Pseudonymised information may still constitute personal data where an individual can reasonably be re-identified.

Anonymised data

Where information has been irreversibly anonymised so that an individual can no longer reasonably be identified, such information may no longer constitute personal data under applicable law.

CarbonEx may use properly anonymised or aggregated information for:

- energy research;
- demand forecasting;
- climate modelling;
- emissions analysis;
- product development;
- impact reporting;
- market intelligence;
- statistical analysis;
- academic or research collaboration;
- investor or partner reporting; and
- other legitimate commercial or public-interest purposes.

32. MARKETING AND COMMUNICATIONS

CarbonEx may send service-related communications such as:

- transaction confirmations;
- security alerts;
- payment notifications;
- order updates;
- delivery notifications;
- account notices;
- service announcements;
- important policy changes; and
- technical notifications.

Where permitted by law, CarbonEx may also send promotional communications regarding:

- CarbonEx services;
- energy products;
- rewards;
- clean-energy programmes;
- climate-finance opportunities;
- partner services; or
- other relevant offerings.

Where marketing communications require consent or an opt-out mechanism under applicable law, CarbonEx will provide an appropriate mechanism.

You may unsubscribe from promotional communications without necessarily affecting essential service communications.

33. COOKIES AND SIMILAR TECHNOLOGIES

Where CarbonEx websites or web-based services use cookies, SDKs, pixels, device identifiers or similar technologies, they may be used for:

- authentication;

- security;
- session management;
- preferences;
- analytics;
- performance monitoring;
- fraud prevention;
- service improvement; and
- other disclosed purposes.

Mobile Apps may use software development kits ("SDKs") and technical identifiers to provide analytics, security and functionality.

Where consent is legally required for non-essential technologies, CarbonEx will provide appropriate controls.

34. CHILDREN'S PRIVACY

CarbonEx services are primarily intended for adults and persons legally capable of entering into relevant transactions.

CarbonEx does not knowingly seek to collect personal data from children where doing so is prohibited by applicable law.

Where CarbonEx becomes aware that personal data belonging to a child has been collected unlawfully, CarbonEx will take appropriate steps consistent with applicable law.

Parents or legal guardians who believe that a child has provided personal data to CarbonEx may contact us at:

carbonexafrica@gmail.com

35. DATA SECURITY

CarbonEx recognises that payment information, energy data, location data, wallet information and emissions information require appropriate security safeguards.

Depending on the nature and risk of processing, CarbonEx may use measures including:

- encryption in transit;

- encryption or equivalent protection at rest where appropriate;
- authentication controls;
- role-based access controls;
- least-privilege access;
- account security mechanisms;
- secure API communications;
- monitoring and logging;
- vulnerability management;
- backups;
- incident-response procedures;
- access reviews;
- device security;
- network security;
- pseudonymisation;
- data minimisation;
- secure development practices; and
- employee confidentiality obligations.

No internet-based system can be guaranteed to be completely secure. CarbonEx therefore continuously seeks to improve the security of its systems.

36. ACCOUNT SECURITY

Users are responsible for maintaining the confidentiality of their account credentials and should:

- use strong passwords;
- avoid sharing authentication credentials;
- protect their mobile devices;
- enable available security features;
- report suspicious activity;
- log out where appropriate; and
- immediately notify CarbonEx if they suspect unauthorised access.

CarbonEx may temporarily restrict accounts or transactions where it reasonably suspects fraud, abuse, security compromise or unlawful activity.

37. DATA BREACHES AND SECURITY INCIDENTS

If CarbonEx experiences a personal-data breach, CarbonEx will assess and respond to the incident in accordance with applicable law and its internal incident-response procedures.

Depending on the nature and severity of an incident, CarbonEx may:

1. investigate the incident;
2. contain and remediate the incident;
3. preserve relevant evidence;
4. assess affected data;
5. notify applicable regulators where required;
6. notify affected individuals where required;
7. cooperate with law-enforcement or other authorities where appropriate; and
8. implement measures to reduce the likelihood of recurrence.

38. DATA RETENTION

CarbonEx retains personal data only for as long as reasonably necessary for:

- the purpose for which it was collected;
- providing services;
- maintaining accounts;
- transaction reconciliation;
- financial recordkeeping;
- legal or regulatory obligations;
- dispute resolution;
- fraud prevention;
- security;
- legitimate business purposes; or
- other lawful purposes.

Different categories of information may have different retention periods.

For example:

- account information may be retained while an account remains active;
- transaction records may be retained for periods required for financial, regulatory or audit purposes;

- security logs may be retained for security and incident-management purposes;
- energy and emissions records may need to be retained for the duration required to substantiate environmental claims or climate-finance activities;
- blockchain records may remain on the relevant blockchain indefinitely; and
- anonymised information may be retained for longer periods because it no longer identifies an individual.

When information is no longer required, CarbonEx may delete, anonymise, aggregate or securely dispose of it in accordance with applicable requirements.

39. DATA SUBJECT RIGHTS

Subject to applicable law and relevant exemptions, CarbonEx recognises that individuals may have rights relating to their personal data.

These may include:

39.1 Right to be informed

You have the right to receive clear information about how your personal data is processed.

39.2 Right of access

You may request access to personal data CarbonEx holds about you.

39.3 Right to rectification

You may request correction of inaccurate, incomplete or outdated personal information.

39.4 Right to object

You may have the right to object to certain processing, including applicable direct marketing.

39.5 Right to restriction

You may have the right to request restriction of processing in circumstances recognised by law.

39.6 Right to data portability

Where applicable, you may request personal data in a structured and commonly used format and, where technically feasible and legally required, request its transmission to another controller.

39.7 Right to erasure

You may request deletion of your personal data where applicable.

However, this right is not absolute. CarbonEx may be required to retain certain information because of legal, contractual, financial, security, fraud-prevention, dispute-resolution or other lawful obligations.

39.8 Right to withdraw consent

Where processing is based on consent, you may withdraw that consent.

Withdrawal does not affect processing lawfully carried out before the withdrawal.

39.9 Rights relating to automated decision-making

Where applicable, you may have rights relating to significant decisions made solely through automated processing.

39.10 Right to lodge a complaint

You may lodge a complaint with the relevant data-protection supervisory authority where you believe your data-protection rights have been violated.

The NDPC identifies rights including access, rectification, objection, restriction, portability, erasure and protection against certain automated decision-making.

40. HOW TO EXERCISE YOUR RIGHTS

You may contact CarbonEx regarding privacy or data-protection requests at:

Email: carbonexafrica@gmail.com

Your request should, where possible, identify:

- your full name;
- registered phone number or email;
- the nature of your request;

- relevant account or transaction information; and
- any information reasonably necessary for us to verify your identity.

CarbonEx may request reasonable information to verify that a request genuinely originates from the relevant data subject or authorised representative.

This is intended to protect users from unauthorised disclosure of personal information.

CarbonEx will respond to valid requests within the period required by applicable law.

The NDPC itself currently describes a 30-day response target for data-subject access requests under its own process.

41. WITHHOLDING INFORMATION

Certain information is necessary for CarbonEx to provide particular services.

For example, without relevant information CarbonEx may be unable to:

- create an account;
- verify a customer;
- process a payment;
- deliver LPG;
- process an electricity transaction;
- connect a customer with a vendor;
- operate certain wallet functions;
- monitor connected energy devices;
- provide location-dependent services;
- provide certain climate-finance rewards; or
- comply with applicable legal obligations.

Where information is optional, CarbonEx will seek to distinguish it from information that is necessary for the requested service.

42. THIRD-PARTY LINKS AND SERVICES

CarbonEx Apps may contain links, integrations or connections to third-party services.

These may include:

- payment providers;
- banks;
- electricity providers;
- logistics providers;
- blockchain networks;
- external wallets;
- partner platforms;
- energy-service providers; and
- other third-party services.

CarbonEx is not responsible for the privacy practices of independent third parties operating their own platforms.

Users should review the privacy policies applicable to those services.

43. OPEN BANKING, MOBILE MONEY AND PAYMENT INTEGRATIONS

Where CarbonEx integrates with payment APIs, mobile-money systems, bank APIs or other financial infrastructure, information necessary to initiate, authenticate, process, reconcile or verify a transaction may be exchanged between CarbonEx and the relevant provider.

The third-party provider may independently process information under its own legal obligations and privacy policy.

CarbonEx seeks to limit information shared with payment providers to what is reasonably necessary for the relevant transaction or service.

44. ELECTRICITY AND ENERGY-SERVICE INTEGRATIONS

Where CarbonEx integrates with electricity vending platforms, utilities, DisCos, energy-service providers or other infrastructure, information may be exchanged to:

- verify an electricity account or meter;
- determine service availability;

- process electricity purchases;
- generate energy transaction records;
- associate energy quantities with a transaction;
- monitor energy consumption where supported;
- generate energy-data records;
- support climate-impact calculations; and
- administer rewards.

Information exchanged may include account identifiers, meter information, transaction information, energy quantity, payment status and relevant service information.

45. CARBONEX DIGITAL MRV

CarbonEx may operate digital Monitoring, Reporting and Verification ("dMRV") infrastructure.

The dMRV system may combine:

- transaction information;
- IoT telemetry;
- energy measurements;
- timestamps;
- location information;
- device information;
- emissions calculations;
- energy quantities;
- verification information; and
- other relevant evidence.

The purpose is to improve the integrity, traceability and auditability of energy and climate-impact information.

Where blockchain or distributed-ledger technology is used, sensitive personal information should, where practicable, remain off-chain while appropriate hashes, identifiers, timestamps, verification status or other technical proofs may be recorded on-chain.

46. RESEARCH, ANALYTICS AND PRODUCT DEVELOPMENT

CarbonEx may use appropriately protected information to:

- understand energy markets;
- improve energy-access models;
- develop clean-cooking technologies;
- improve smart energy systems;
- improve demand forecasting;
- improve emissions measurement;
- develop new products;
- improve logistics;
- evaluate programme impact;
- identify system errors;
- conduct statistical analysis; and
- conduct research and development.

Where possible and appropriate, CarbonEx will use aggregated, anonymised or pseudonymised information for these purposes.

47. FRAUD PREVENTION AND SECURITY ANALYTICS

CarbonEx may analyse information to identify:

- suspicious payments;
- unusual account behaviour;
- abnormal energy consumption;
- device manipulation;
- repeated failed authentication;
- suspicious wallet activity;
- fraudulent transactions;
- attempted account takeover;
- vendor abuse;
- delivery fraud; and
- other security threats.

This may involve automated risk analysis.

Where applicable law provides rights regarding automated decision-making, CarbonEx will apply the required safeguards.

48. ENERGY AFFORDABILITY AND ACCESS

One of CarbonEx's purposes is to improve access to affordable and reliable energy.

For this purpose, CarbonEx may analyse aggregated or individual-level information relating to:

- energy consumption;
- energy purchases;
- refill frequency;
- geographic demand;
- energy availability;
- vendor proximity;
- delivery requirements;
- household energy patterns; and
- energy expenditure patterns.

This may allow CarbonEx to develop:

- demand forecasts;
- refill recommendations;
- energy-access insights;
- logistics optimisation;
- subsidy or reward mechanisms;
- affordability programmes; and
- other energy-access services.

Any eligibility determination involving personal data will be conducted in accordance with applicable law.

49. DATA OWNERSHIP AND INTELLECTUAL PROPERTY

Personal data remains subject to applicable data-protection rights and laws.

CarbonEx may own or have rights in:

- its software;
- algorithms;

- data models;
- databases;
- dMRV architecture;
- analytics systems;
- aggregated datasets;
- anonymised datasets;
- statistical models;
- system-generated insights; and
- other intellectual property.

Ownership of CarbonEx technology does not remove or limit your statutory rights over your personal data.

50. YOUR RESPONSIBILITIES WHEN USING CARBONEX

You should ensure that information you provide to CarbonEx is:

- accurate;
- complete;
- current;
- lawful;
- not misleading; and
- yours to provide or lawfully authorised.

If you provide CarbonEx with another person's personal data, you should ensure that you are authorised to provide it and that the relevant person has been appropriately informed where required by law.

51. CHANGES TO THIS PRIVACY POLICY

CarbonEx may update this Privacy Policy from time to time to reflect:

- changes in our services;
- new App features;
- new technology;
- new payment or energy integrations;

- changes to our data practices;
- changes to applicable law;
- regulatory guidance;
- security developments; or
- improvements to our privacy practices.

When changes are material, CarbonEx may provide additional notice through:

- the App;
- website;
- email;
- notification;
- account messaging; or
- other appropriate means.

The **Last Updated** date at the beginning of this Privacy Policy indicates when the policy was most recently revised.

52. GOVERNING DATA-PROTECTION FRAMEWORK

This Privacy Policy is intended to operate consistently with applicable Nigerian data-protection law, including the **Nigeria Data Protection Act 2023**, together with applicable regulations, directives, guidance and other legal requirements.

The NDPC is Nigeria's statutory data-protection authority established under the Nigeria Data Protection Act 2023.

Where CarbonEx processes personal data subject to another jurisdiction's mandatory data-protection framework, CarbonEx will seek to comply with applicable requirements to the extent legally applicable.

For individuals whose data is subject to the GDPR, the relevant rights and principles may include transparency, access, rectification, erasure, restriction, portability, objection and safeguards relating to automated decision-making.

53. REGULATORY COMPLAINTS

If you believe CarbonEx has processed your personal data unlawfully or has failed to respect your applicable data-protection rights, you are encouraged to first contact CarbonEx so that we can investigate and attempt to resolve the matter.

You may also have the right to lodge a complaint with the applicable supervisory authority.

For Nigeria, the relevant supervisory authority is the:

Nigeria Data Protection Commission (NDPC)

The NDPC provides mechanisms for data-subject complaints and privacy-related matters.

54. CONTACT CARBONEX

For privacy questions, requests, complaints or data-subject rights requests:

CarbonEx Agro Trading Nig. Ltd.

RC: 2018158

Email: carbonexafrica@gmail.com

Location: Nigeria

When contacting us, please state clearly that your communication concerns **Data Privacy** or a **Data Subject Request**.

55. IMPORTANT PRIVACY NOTICE

CarbonEx's services involve the processing of information necessary to connect people with energy.

This can include information relating to:

Identity → Account → Payment → Energy Purchase → Energy Consumption → Location → Logistics → Emissions → Climate Impact → Rewards → Wallets → Tokenized Assets.

Because these components are interconnected, disabling or restricting certain categories of information may affect the availability of corresponding CarbonEx services.

For example, disabling location access may affect delivery tracking or location-dependent energy services. Disabling connected-device data may affect real-time energy monitoring. Restricting transaction information may prevent CarbonEx from processing energy purchases or administering rewards.

CarbonEx will nevertheless seek to respect applicable privacy rights and process only information reasonably necessary for the relevant purpose.

56. OUR COMMITMENT

CarbonEx believes that the transition to cleaner, more affordable and more accessible energy should not require people to surrender control over their personal information.

Our objective is therefore to build privacy into the CarbonEx ecosystem alongside:

- energy access;
- clean cooking;
- digital payments;
- smart energy;
- IoT;
- emissions measurement;
- climate finance;
- carbon markets;
- digital MRV;
- AI;
- energy logistics; and
- tokenized energy and environmental assets.

We are committed to continuously improving the security, transparency and responsible use of the information entrusted to us.

CarbonEx Agro Trading Nig. Ltd.

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