

## **Privacy Statement**

# Please read this carefully before consenting to use any of our services

Global Accelerex (Ghana) Limited is committed to ensuring that all personal data processed is done without infringing on your rights as a data subject, in a lawful and reasonable manner.

### What personal data does Global Accelerex (Ghana) Limited use?

When you sign up/register as a user any of our products (Rexretail, Rexpay), you provide us with your basic information i.e.

- A. Merchant Name
- B. Merchant Residential Address
- C. Certificate of Incorporation
- D. Certificate to Commence Business
- E. Tax Identification Number
- F. Bank Account Information
- G. Any other documentation that the Bank of Ghana may require.

## How does Global Accelerex (Ghana) Limited use your personal data?

We use your Personal Data only for purposes related to Global Accelerex (Ghana) Limited, as following:

- To perform our Know Your Customer (KYC) duties as instructed by regulatory authorities.
- Provide you the best customer experience described when you sign up to any of our services.
- Settle your transactions that pass through our system
- Provide you with reports of your transactions

- Monitor your transaction activities to identify potentially fraudulent activity and to ensure compliance with the user terms that apply to Global Accelerex (Ghana) Limited.
- Manage our relationship with you by responding to your queries submitted to us or asking for your feedback.
- Manage our legal and regulatory obligations

Global Accelerex Ghana may utilize third-party service providers that will store & have access to and process your personal data. If such thirdparty services providers process & control your data outside Ghana, such transfer of personal data will be subject to the laws and standard contractual clauses for processing data in that country.

If you are using Global Accelerex (Ghana) Limited services outside Ghana for better performance and experience of our products and services, with your explicit and separate consent from the privacy policy, we might temporarily store your data and deliver content & services that support Global Accelerex (Ghana) Limited through cloud servers located outside Ghana.

How long does Global Accelerex (Ghana) Limited keep your data? The data and information that identify you as an individual will be stored with as long as various laws require. Please refer to our Retention Policy for further details.

## What authorizes Global Accelerex (Ghana) Limited to process the data as a data controller?

Global Accelerex (Ghana) Limited has the following lawful bases to process personal data:

## **Execution of the agreement**

The legal basis for processing the personal data of the interested party which is collected is the execution of the service agreement. In this regard, the interested party is obliged to provide that data necessary for its execution.

## **Legal obligations**

Global Accelerex Ghana Limited is required under the Payment Systems and Services Act, 2019 (987) to perform KYC on all those who use their services.

#### Legitimate interest

In relation to the following purposes, the legal basis of the processing of the personal data of the interested party will be the legitimate interest of Global Accelerex (Ghana) Limited.

#### **Third Party Service Providers**

We may share your personal data with our trusted third-party service providers, who, on our behalf, operate, maintain, and/or support our IT systems and IT infrastructure, services, our payment channels.

#### YOUR RIGHTS AND HOW TO WITHDRAW CONSENTS

You have certain rights according to the applicable data protection regulation. Some of the rights are rather complex and include exemptions, accordingly you are recommended to read relevant laws and guidance from the regulatory authorities for a full explanation of these rights. However, you can find a summary of your rights if you unfold below sections.

## The right to access

You have a right to obtain the confirmation as to whether your personal data are being processed by Global Accelerex (Ghana) Limited. In addition, you have a right to obtain more detailed information about the personal data kept and the processing undertaken by us and under certain circumstances the right to receive a copy of this personal data.

## The right to rectification

You have the right to have inaccurate personal data about you rectified, and, considering the purpose of the processing, to have incomplete personal data completed.

## The right to erasure

In some cases, you have the right to erasure of your personal data without undue delay. Those circumstances include i) the personal data is

no longer necessary in relation to the purposes for which it was collected or otherwise processed; ii) you withdraw consent to consent-based processing; iii) the processing is for direct marketing purposes and iv) the personal data has been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary; i) for compliance with legal obligations; or ii) for the establishment, exercise, or defense of legal claims.

After some of your personal data has been erased based on your request, some copies of it might still be stored in our backups for some time. The reason why we do not automatically erase the data from our backups is that it might create security risks. If you want more information about this, please contact our Data Protection Supervisor.

### The right to restriction of processing

In some cases, you have the right to restrict the processing of your personal data. Where processing has been restricted, we may continue to store your personal data. However, we will only otherwise process it i) with your consent; ii) for the establishment, exercise, or defense of legal claims; iii) for reasons of important public interest.

### The right to object

You have the right to object to the processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for i) the performance of a task carried out in the public interest or in the exercise of any official authority vested in Global Accelerex (Ghana) Limited; or ii) the purpose of legitimate interests pursued by us or a third party. In such case we will cease processing the personal data, unless we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms or the processing is for the establishment, exercise, or defense of legal claims.

You also have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

## The right to withdraw consent

To the extent that the legal basis for the processing is your consent, you have the right to withdraw from that consent at any time.

In case you withdraw from a consent given, then we will cease to process your personal data, unless and to the extent the continued processing is permitted or required according to the applicable personal data regulation or other applicable laws and regulations. The withdrawal from your consent will in no event affect the lawfulness of processing based on consent before its withdrawal.

If you refrain from providing required consents, or later withdraw from the consents, it might have consequently that you may not be able to benefit from some of the service offerings provided by us.

### The right to complain

You may always lodge a complaint with the Data Protection Commission. Data Protection Commission is supervisory authority in Ghana ensuring companies comply with the Data Protection Act, 2012 (Act 843). You can find their contact information.

We do our best to ensure that we protect your personal data, keep you informed about how we process your personal data and comply with the applicable data protection regulation. In case you are not satisfied with the processing and protection of your personal data or the information you have received from us, then we urge you to inform us for us to improve. Please also do not hesitate to contact us if you want to make use of your rights.

Please contact us through the contacts listed. Please also provide us with relevant information to take care of your request, including your full name and email address so that we can identify you. We will respond to your request without undue delay.

You can always withdraw from a consent to receive newsletters etc. and unsubscribe from an e-mail list by following the instructions in any e-mail or other communication you receive from us.

If you have created an account with us, then you can also manage and delete your account by logging into the account and administer your account.

### **Changes to This Privacy Statement**

Occasionally Global Accelerex (Ghana) Limited might make changes to the Privacy Statement. When such changes are made, will make sure to provide you with prominent notice as appropriate under the circumstances, e.g., by displaying a prominent notice within Global Accelerex (Ghana) Limited or by sending you an email. In some cases, we will notify you in advance. Please, therefore, make sure you read any such notice carefully.

#### **Contact Us:**

Global Accelerex (Ghana) Limited details:

 If you have any questions, please feel free to contact us at any time at

info@globalaccelerexghana.com.gh

or

our Data Protection Supervisor at lawrence.tabi@globalaccelerexghana.com.gh

• If you feel like something is missing or misleading in our Privacy Policy, please feel free to notify us.

#### **Contact details of the Data Protection Commissioner's Office:**

If you are unhappy with how your data has been processed by the company or feel your data protection rights have been breached, you have the right to complain to the Data Protection Commissioner's Office at:

info@dataprotection.org.gh

or

East Legon, Paw Paw Street,

GPS: GA-414