

Data and Account Deletion Procedure

Company: Andray Finance Limited

Effective Date: Monday, September 01, 2025

Version: 1.0

1. Introduction & Purpose

Andray Finance Limited ("we," "us," "our") is committed to protecting the privacy and data rights of our users. This Data and Account Deletion Procedure outlines the process for users ("you," "your") to request the deletion of their personal data and/or the permanent closure of their lending account, in accordance with the Nigeria Data Protection Act (NDPA) 2023 and other applicable regulations.

This document ensures that such requests are handled in a secure, timely, and compliant manner.

2. Scope

This procedure applies to all current and former users of the Andray Finance Limited mobile application and digital lending services who wish to:

- a) Request the permanent deletion of their personal data from our systems.
- b) Request the permanent closure of their user account.

3. User Rights Under the NDPA

Under the NDPA, you have the right to request the deletion of your personal data where:

- The personal data is no longer necessary for the purpose for which it was collected.
- You withdraw your consent on which the processing was based (where applicable).
- You object to the processing and there are no overriding legitimate grounds for the processing.
- The personal data has been unlawfully processed.
- The personal data must be erased for compliance with a legal obligation in Nigeria.

4. How to Submit a Request

To submit a request for data deletion or account closure, you must use one of the following verified methods to ensure security and prevent fraudulent requests:

Primary Method: In-App Request

To delete your Andray Finance account:

Log In: Access your Andray Finance app by logging in or downloading the app if it has been previously uninstalled.

Navigate: Go to the 'Account' section within the app.

Delete Account: Scroll down to find the "Delete Account" option and tap on it to initiate the deletion process. Upon initiating the deletion request, our backend services will process your account for deletion. However, there are certain conditions under which account deletion cannot be processed:

Outstanding Loans: If you have any outstanding loans with Andray Finance, you are required to settle these loans before your account can be deleted.

Account Balance: If your account has any remaining balance, you must transfer this balance out of your account before deletion can proceed.

Legal or Regulatory Actions: If your account is involved in any ongoing legal or regulatory actions, we are obligated by law to resolve these matters before proceeding with account deletion. Please ensure compliance with these conditions to facilitate the smooth deletion of your account.

If, however, you want to do a partial deletion of your data, such as removing existing bank accounts, debit cards, or direct debit mandates, please log into the Andray Finance app, go to the appropriate sections under Account / Settings and delete. Should you require additional help with deletion, please contact us via email.

Follow the on-screen instructions, which may include re-authenticating your identity and stating your reason for the request.

Alternative Method: Email

Send a formal request from the email address registered with your account to: dpo@andrayfinance.com with the subject line: "Data Deletion Request - [Your Full Name]".

The email must include:

- Your full name.
- Your registered phone number.
- Your Bank Verification Number (BVN) for identity verification purposes.
- A clear statement: "I request the permanent deletion of my personal data and closure of my account with Andray Finance Limited."

Note: We cannot accept requests via phone call, social media messaging, or from a third party without a legally binding power of attorney, to protect your data security.

5. Verification Process

Upon receiving your request, our Data Protection Officer (DPO) will:

1. **Acknowledge receipt** of your request via email or in-app notification within **24 hours**.
2. **Verify your identity** by cross-checking the information provided (name, phone number, BVN, registered email) with our records. This is a critical step to prevent unauthorized deletion.
3. If verification fails, we will contact you to provide further proof of identity.

6. Processing the Request

Once your identity is verified:

1. **Assessment:** We will assess your request against the legal grounds for deletion under the NDPA. We will check for any legal or regulatory obligations that require us to retain certain data (see Section 7: Limitations on Deletion).
2. **Action:** If the request is valid and approved:
 - Your account will be permanently deactivated, and you will no longer be able to log in.
 - We will initiate the process to delete your personal data from our active operational databases.
3. **Timeline:** We will complete the entire process (from verification to deletion) within **30 (thirty) days** of the request verification. If the request is complex, we will notify you of the need for an extension, which will not exceed an additional 30 days.

7. Limitations on Deletion (Data We Must Retain)

Due to our legal and regulatory obligations as a licensed financial institution in Nigeria, we are required to retain certain information for defined periods, even after an account deletion request. This data will be securely archived and isolated from routine processing. It includes, but is not limited to:

- **Transaction Records:** Data related to loan transactions, repayments, and history as required by the Central Bank of Nigeria (CBN) guidelines and tax laws (typically for a minimum of **5 to 7 years**).
- **BVN Information:** Data tied to your Bank Verification Number for anti-fraud and creditworthiness assessment purposes, as mandated by regulatory frameworks.
- **Legal Holds:** Information that is part of an ongoing investigation, litigation, or dispute resolution process.
- **Credit Bureau Data:** Historical loan performance data already reported to credit bureaus (e.g., CRC Credit Bureau, FirstCentral Credit Bureau). While we can mark an account as closed, the historical record of your loan conduct cannot be erased from the bureau's records as per their own retention policies mandated by law.

Once the mandatory retention period expires, this archived data will be securely and permanently deleted.

8. Confirmation of Deletion

Upon successful completion of the deletion process, we will send a confirmation message to your registered email address, specifying:

- That your account has been closed.
- What categories of personal data have been deleted from our active systems.
- What categories of data have been retained and the legal reason for their retention (e.g., "Your loan transaction records from 2023 have been archived to comply with CBN's 5-year retention policy").

9. Complaints

If you are dissatisfied with our handling of your data deletion request, you have the right to lodge a complaint with our Data Protection Officer at dpo@andrayfinance.com.

You also have the right to escalate the matter to the national regulator:

Nigeria Data Protection Commission (NDPC)

Website: <https://ndpc.gov.ng/>

10. Contact Information

For any questions regarding this procedure or your data privacy rights, please contact:

Data Protection Officer

Andray Finance Limited

Cardinal Place, 13 Ayo Babatunde Crescent, Oniru, Lekki – Lagos, Nigeria

Email: dpo@andrayfinance.com

Disclaimer: This procedure is a living document and will be reviewed and updated periodically to ensure continued compliance with evolving Nigerian data protection laws and regulations.