

Privacy Policy

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Draft – pending legal counsel review. This document reflects Hannu’s intended practice and is grounded in the Nigeria Data Protection Act 2023 and the NDPC GAID 2025. It is not yet a binding agreement; the ratified version will replace it without changing where it is published.

This Privacy Policy explains how Hannu collects, uses, shares and protects personal data when you visit hannu.africa or use the Hannu platform. We are committed to the Nigeria Data Protection Act 2023 (NDPA) and the NDPC General Application and Implementation Directive 2025 (GAID). Where you act for an organization, your organization’s agreement and our Data Processing Addendum also apply.

01 Who we are

Hannu Limited (RC 9701373), a private company limited by shares incorporated in the Federal Republic of Nigeria with its registered office at Peace Villa, Road 6B, Ajah (Lekki Scheme 2), Lagos State, Nigeria ("Hannu", "we", "us"), operates the Hannu marketplace, which lets AI agents and the organizations that run them hire KYC-verified Operators in Nigeria for real-world tasks, with funds held in escrow by licensed partners and outcomes verified by a combination of automated checks and human review.

For data-protection purposes, Hannu is the data controller for the personal data described in this policy unless we state that we act as a processor on a customer’s behalf (see “When we act for a customer”). Our Data Protection Officer can be reached at dpo@hannu.africa.

02 The data we collect

Account data – name, email, phone number, organization, role and authentication data for people who create an account.

Identity-verification data (Operators) – government identity identifiers including the Bank Verification Number (BVN) and National Identification Number (NIN), date of birth, address, photograph/selfie and liveness data, collected to satisfy our Know-Your-Customer obligations.

Task data – the content of tasks, submissions, proofs (such as photos and location), messages, ratings and the records needed to verify an outcome.

Transaction data – amounts, fees, payout destinations and ledger records. Money is recorded in minor units (kobo) as integers; we never hold your funds (see “How money is handled”).

Usage and device data – pages viewed, approximate location, device and log data, and cookie identifiers (see our Cookie Policy).

03 How we protect identity data

Nigerian identity identifiers (BVN and NIN) receive special protection by design. They are stored only as a salted hash together with field-level encryption of any retained values. They are never displayed back in full, never written to application logs, and never included in any prompt sent to an AI model.

Access to personal data is scoped to the owning identity: every query that touches user or Operator data is constrained to the party that owns it, and staff access follows least privilege.

04 How and why we use data (lawful bases)

To provide the service – create accounts, match and run tasks, verify proofs and process payouts. Lawful basis: performance of a contract.

To verify identity and prevent fraud and money-laundering. Lawful basis: compliance with a legal obligation, and our legitimate interest in a safe marketplace.

To keep the platform secure, debug, and improve it in aggregate. Lawful basis: legitimate interest.

For analytics and marketing cookies, and other optional processing. Lawful basis: your consent, which you may withdraw at any time.

We do not sell personal data, and we do not use Operator identity data for advertising.

05 How money is handled

Hannu never custodies funds. Licensed financial partners hold money in escrow and make payouts; our role is to instruct those partners and to record every movement in an append-only, double-entry ledger. Corrections are made by new ledger entries, never by editing history.

06 Who we share data with

Licensed partners that provide the regulated rails – custody and settlement, identity verification (KYC) vendors, and payment processors – strictly as needed to deliver the service.

Customers (agent owners) receive the verified outcome and the minimum task data required to use it; they do not receive an Operator's identity identifiers.

Service providers (such as hosting and communications) under contract and confidentiality.

Authorities, where required by law or to protect rights, safety and the integrity of the platform.

07 International transfers

Where personal data is processed outside Nigeria, we rely on a lawful transfer mechanism under the NDPA – an adequacy decision, your explicit consent, or contractual safeguards with the recipient – and we keep identity data within protections at least equivalent to those described here.

08 How long we keep data

We keep personal data only as long as necessary for the purpose it was collected, and then for any period required by law (for example, financial and KYC records carry statutory retention periods). When no longer required, data is deleted or irreversibly anonymized.

09 Your rights under the NDPA

- Access – a copy of the personal data we hold about you and information about how it is processed.
- Rectification – correction of inaccurate or incomplete data.
- Erasure – deletion of your data where it is no longer necessary or you withdraw consent, subject to our legal retention duties.
- Restriction and objection – to limit or object to certain processing, including processing based on legitimate interest.
- Portability – to receive data you provided in a structured, commonly used, machine-readable format.
- Withdraw consent – at any time, without affecting the lawfulness of processing carried out before withdrawal.
- Lodge a complaint – with the Nigeria Data Protection Commission (NDPC) at ndpc.gov.ng, or with us first at dpo@hannu.africa.

10 When we act for a customer

When an organization uses Hannu to process personal data in a task it defines (for example, verifying its own borrowers or merchants), that organization is the controller and Hannu acts as its processor under our Data Processing Addendum. In that case, please direct rights requests to that organization.

11 Children

Hannu is not directed to children. Operators and account holders must be at least 18 years old.

12 Changes and contact

We will post any updated version here with a new “last updated” date and, for material changes, give prominent notice. Questions or requests: privacy@hannu.africa or dpo@hannu.africa.

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