SHEPHARDLINK PRIVACY POLICY

Last Updated: October 12 2026

ShephardLink Innovative Solutions Ltd ("ShephardLink", "we", "us" or "our") respects your privacy.

This Privacy Policy explains how we collect, use, disclose, retain and protect personal data when you use the ShephardLink website, marketplace, applications and related services.

This policy shall operate in line with the Nigeria Data Protection Act 2023.

The Nigeria Data Protection Commission identifies rights including access, rectification, objection, restriction, portability, erasure and complaint rights for data subjects. (Nigeria Data Protection Commission)

1. WHO WE ARE

ShephardLink Innovative Solutions Ltd

Website: https://shephardlink.com

Email: hello@shephardlink.com

Nigeria

2. DATA COLLECTION

Depending on how you use ShephardLink, we may collect:

Account information

- name;
- email address;
- telephone number;
- account credentials;
- profile information.

Customer information

- service Requests;
- service location;
- photographs;
- descriptions of required Services;
- transaction information;
- communications with Providers;
- reviews and ratings.

Provider information

- identity information;
- business information;
- service categories;
- service areas;
- qualifications;
- licenses;
- certificates;
- verification results;

- photographs;
- payment/payout information.

Verification information

Where necessary, we may process identity or business verification information through approved verification providers.

We will seek to minimize the personal data retained by ShephardLink to what is reasonably necessary for the verification purpose.

Payment information

Payments may be processed through third-party payment providers.

Where the payment provider handles sensitive payment credentials directly, ShephardLink may receive transaction information without receiving or storing complete payment-card credentials.

Technical information

We may collect:

- IP address;
- device information;
- browser information;
- operating system;
- approximate location;

- log information;
- cookies and similar technologies;
- Platform usage information.

3. ADMINISTRATIVE USE OF DATA

We may use personal data to:

- create and manage accounts;
- match Customers with Providers;
- process Requests;
- facilitate transactions;
- process payments;
- communicate with users;
- provide customer support;
- investigate complaints;
- prevent fraud;
- maintain Platform security;
- verify Providers;
- enforce our Terms;
- comply with legal obligations;
- improve Platform functionality;
- analyze Platform usage;
- send permitted marketing communications.

We do not use vague “service improvement” language as a substitute for explaining material processing purposes.

4. LAWFUL BASES

Depending on the circumstances, processing may be based on:

- performance of a contract;
- compliance with a legal obligation;
- consent;
- legitimate interests where permitted;
- protection of vital interests;
- other lawful bases recognized by applicable law.

5. LOCATION INFORMATION

We may process location information where reasonably necessary to:

- match Customers with nearby Providers;
- determine service areas;
- facilitate appointments;
- prevent fraud;
- improve Platform functionality.

Where precise location is not necessary, we will seek to use less precise information.

6. PROVIDER VERIFICATION

Provider verification may involve third-party verification services.

Depending on the verification method, information may include:

- government-issued identification;
- photographs/selfies;
- business documentation;
- qualification documents;
- address information;
- verification results.

Where possible, ShephardLink will avoid retaining full identity documents when a verification result is sufficient for the relevant purpose.

7. DATA SHARING POLICY

We may share information with:

- Providers, where necessary to perform a requested Service;
- Customers, where necessary for a Provider to perform a Service;
- payment providers;
- identity verification providers;
- hosting providers;
- communications providers;
- analytics providers;
- customer-support providers;
- professional advisers;
- regulators or law-enforcement authorities where legally required;
- other service providers acting on our behalf.

We do not sell personal data simply because a third party wants access to it.

8. CUSTOMER AND PROVIDER VISIBILITY

Certain information may be visible to other Platform users.

For example, a Provider profile may display:

- business or professional name;
- service categories;
- service area;
- profile photograph or business logo;
- reviews;
- ratings;
- applicable verification badges.

We will not intentionally publish sensitive verification documents such as government identification documents as public profile information.

9. COMMUNICATIONS

We may communicate with you by:

- email;
- telephone;
- SMS;

- WhatsApp or other permitted communication channels;
- Platform notifications.

Operational communications may be sent where necessary to provide the Service.

Marketing communications will be subject to applicable consent, opt-out and other legal requirements.

10. PLATFORM MESSAGES

If the Platform provides messaging between Customers and Providers, messages may be retained and accessed where reasonably necessary for:

- customer support;
- dispute resolution;
- fraud prevention;
- security;
- legal compliance;
- investigation of serious misconduct;
- enforcement of Platform rules.

Users should not send passwords, PINs or unnecessary sensitive information through Platform messaging.

11. COOKIES

We may use cookies and similar technologies for:

- essential Platform functionality;

- login sessions;
- preferences;
- analytics;
- security;
- permitted marketing.

Where required, we will provide appropriate cookie choices.

12. DATA SECURITY

We use reasonable technical and organizational measures designed to protect personal data against:

- unauthorized access;
- accidental loss;
- misuse;
- unauthorized disclosure;
- alteration;
- destruction.

No internet system can be guaranteed completely secure.

13. DATA INCIDENTS

If ShephardLink becomes aware of a personal-data security incident, we may:

1. identify and contain the incident;
2. investigate affected systems and information;
3. assess potential impact;
4. preserve relevant evidence;

5. take corrective measures;
6. notify regulators where legally required;
7. notify affected persons where required or appropriate.

14. DATA RETENTION

We retain personal data only for as long as reasonably necessary for the relevant purpose, subject to legal, accounting, regulatory, dispute-resolution and security requirements.

We maintain internal retention rules for categories including:

- account information;
- transaction records;
- verification records;
- customer-support records;
- reviews;
- security logs;
- marketing preferences.

Where full identity documents are not necessary after verification, we seek to delete or minimize them in accordance with applicable retention requirements.

15. INTERNATIONAL TRANSFERS

Some service providers used by ShephardLink may process information outside Nigeria.

Where personal data is transferred across borders, ShephardLink will use safeguards required by applicable data-protection law.

16. DATA RIGHTS

Subject to applicable law, you may have rights to:

- be informed;
- access your personal data;
- correct inaccurate information;
- object to certain processing;
- restrict processing in applicable circumstances;
- request deletion/erasure;
- obtain or request portability of certain information;
- withdraw consent where consent is the lawful basis;
- object to certain automated decision-making;
- lodge a complaint with the relevant supervisory authority.

The NDPC expressly identifies several of these rights in its public guidance. (Nigeria Data Protection Commission)

17. MARKETING

You may receive marketing communications where permitted by law.

You can unsubscribe from marketing communications using the available unsubscribe mechanism or by contacting us.

Operational messages relating to your account or transaction may continue where necessary.

18. CHILDREN

ShephardLink is intended primarily for adults.

We do not knowingly collect children's personal information for purposes unrelated to legitimate Platform services.

If you believe a child has provided personal information to us improperly, contact us.

19. THIRD-PARTY WEBSITES

The Platform may contain links or integrations with third-party services.

Their privacy practices are governed by their own policies.

ShephardLink is not responsible for privacy practices outside our control.

20. AUTOMATED DECISION-MAKING

We may use automated systems for limited purposes such as:

- matching Requests to Providers;
- fraud detection;
- spam prevention;
- ranking or displaying relevant Platform content.

Where applicable law gives you rights concerning solely automated decisions with significant effects, we will provide applicable safeguards.

21. LEGAL DISCLOSURES

We may disclose personal data where reasonably necessary to:

- comply with legal obligations;
- respond to lawful requests;
- protect users;
- investigate fraud;
- prevent serious harm;
- enforce our agreements;
- establish or defend legal claims.

22. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time.

Material changes will be communicated through appropriate means.

The “Last Updated” date will identify the current version.

23. PRIVACY COMPLAINTS

For privacy questions, requests or complaints:

Email: hello@shephardlink.com

Company: ShephardLink Innovative Solutions Ltd

Website: https://shephardlink.com

We will review privacy complaints and respond in accordance with applicable requirements.

You may also have the right to complain to the Nigeria Data Protection Commission.

24. GOVERNING FRAMEWORK

This Privacy Policy is intended to operate consistently with applicable Nigerian data-protection legislation and regulatory requirements, including the Nigeria Data Protection Act 2023.