



HECKERBELLA PRIVACY NOTICE

(Effective Date: 01/12/2025)

Summary

Heckerbella builds and runs software. We collect personal data in two situations: when you contact us or use our website, and when a client asks us to process data on their behalf. We do not sell personal data, and we do not use it for anything we have not told you about here.

You have rights over your data under the Nigeria Data Protection Act 2023 to see it, correct it, delete it, restrict or object to its use, take it elsewhere, and complain. To use any of them, email our Data Protection Officer at dpo@heckerbella.com. We will acknowledge within 72 hours and respond within 30 days, free of charge.



1. Who We Are

Heckerbella is an information technology company incorporated in Nigeria (RC-935428) that designs, builds, hosts, and maintains software for its clients and sells its own software products. We deliver these services through a web and mobile portal, client-specific portal, and our website at www.heckerbella.com (together, the "Platform"). In this Notice, "Heckerbella", "we", "our" and "us" mean Heckerbella.

This Notice explains what personal data we handle, why, on what lawful basis, who we share it with, how long we keep it and what you can require of us, according to the Nigeria Data Protection Act 2023 ("NDPA") and the Nigeria Data Protection Commission's General Application and Implementation Directive 2025 ("GAID").

2. Our Two Roles: Controller and Processor

Nigerian law distinguishes between an organization that decides why and how personal data is used (the data controller) and one that only handles data on someone else's written instructions (the data processor). Heckerbella does both, and which role we play changes what you can ask of us.

Activity	Our role	What this means for you
Our website, contact form, social media accounts and marketing	Controller	We decide the purpose. This Notice governs, and you can exercise all your rights directly with us.
Our client relationships: onboarding, service delivery, support and billing	Controller	We decide the purpose. This Notice governs.
Building, hosting, maintaining or supporting a system for a client, and processing the data inside it	Processor	The client decides the purpose and the lawful basis. Their privacy notice governs, not ours. See section 8.

3. Who and What This Notice Covers

This Notice applies to personal data we process when you:

HECKERBELLA LIMITED 9TH Floor Ibukun House
14 Adetokunbo Ademola Street
Victoria Island, Lagos.

+234(0)7067358926
support@heckerbella.com
www.heckerbella.com

Directors: Yemi Keri (Nigerian); T.S. Adajero (Nigerian)

- visit www.heckerbella.com or any specific portal we operate in our own name;
- complete our contact form or otherwise write, call or message us;
- interact with our official accounts on LinkedIn, Facebook, X (formerly Twitter) or Instagram;
- are a client, or work for a client, and use our support channels;
- attend an event we host or exhibit at, or subscribe to our updates; or
- visit our Lagos office, where CCTV and a visitor register may operate.

It also explains, in section 8, how we handle personal data transmitted to us by a client acting as data controller.

This Notice does not cover: the websites of other organizations that we link to, such as the social media platforms, which separate controllers of your account data from them; or systems we operate for a client, where the client's own privacy notice applies.

This Notice should be read together with our Consumer Code of Practice at <https://heckerbella.com/wp-content/uploads/2026/02/Heckerbella-Consumer-Code-of-Practice.pdf> and our Cookie Notice, where it exists. Where those documents conflict with this Notice on a data protection question, this Notice prevails.

4. The Personal Data We Collect

We collect only what we need for the purposes set out in section 7. The table below shows each category, what it contains and where it comes from.

Category	What it includes	Source
Identity and contact data	First and last name, organization name, job title, office address, email address, telephone number, and anything else you choose to write in a message to us	Provided by you through our contact form, by email, by phone or in person
Social media data	Your username or handle, and the content of any public post, comment or direct message you send us	Provided by you when you interact with our accounts
Client service data	Contact details of the client's representatives, onboarding and due-diligence information required to open the account, support tickets and correspondence, service usage records	Provided by the client, or generated as we deliver the service

Category	What it includes	Source
Payment and billing data	Bank account number, account holder name, invoice and payment records. We do not store full payment card numbers	Provided by the client, or generated by our billing process
Technical and security data	Access logs generated by our security monitoring	Collected automatically when you use the Platform
Marketing data	Your subscription status and preferences	Provided by you when you subscribe; generated when you interact with our messages
Client-instructed data	Whatever categories the client specifies in the data processing agreement. We do not choose them	Transmitted to us by the client as data processor

Where we obtain your personal data from a source other than you, for example from your employer, a business directory or a public register we will tell you the source when we first contact you, as the NDPA requires.

4.1 Sensitive personal data

Sensitive personal data means data revealing ethnic origin, religious or similar beliefs, health status, sex life, political opinions, trade union membership, criminal records, genetic and biometric data, and any other category the Commission designates. In Nigeria, processing sensitive personal data is consent-centric under the NDPA.

When we process such data, we follow the requirements of the NDPA and implement safeguards commensurate with the sensitivity of this data.

5. The Lawful Basis for Each Activity

We process personal data only where the NDPA permits it. Where we rely on our legitimate interests, we first carry out and document a Legitimate Interest Assessment in the form set out by law, and we make it available to the Commission on request.

Processing activity	Lawful basis (NDPA)	Why it applies
Replying to enquiries from our website, email or social media	s. 25(1)(a) consent; or s.25(1)(b)(i) steps taken at your request before entering into a contract;	You asked us to get in touch. Answering you is what you expect and involves no more data than you gave us.

Processing activity	Lawful basis (NDPA)	Why it applies
	or s.25(1)(b)(v) legitimate interest	
Onboarding clients and delivering our services	s.25(1)(b)(i) performance of a contract	We cannot provide the service without processing the data of the people who use and administer it.
Invoicing and taking payment	s.25(1)(b)(i) performance of a contract	Payment is a contractual term.
Keeping accounting, tax and transaction records	s.25(1)(b)(ii) compliance with a legal obligation	Nigerian company and tax legislation requires us to retain accounting records for a fixed period, whether or not you would prefer otherwise.
Security logging, access monitoring, fraud and abuse prevention, and system integrity	s.25(1)(b)(v) legitimate interest	Protecting the Platform protects everyone whose data is on it.
Marketing emails, newsletters and event invitations	s.25(1)(a) consent	Requested separately from anything else, never bundled into our terms, and withdrawable in one click.
Responding to a lawful request from a court, regulator or law enforcement agency	s.25(1)(b)(ii) legal obligation; or s.25(1)(b)(iii) vital interests where life or safety is at risk	We comply with valid legal processes, and only with valid legal processes.
Processing carried out on a client's written instructions	Determined by the client as data controller	We do not select the basis. Our obligation is to act only on documented instructions.
Any sensitive personal data we process	s.30 NDP explicit consent, or another ground permitted by s.30	Held to a higher standard, with consent recorded and withdrawable.

6. Consent, and How to Withdraw It

Where we rely on your consent, we ask for it clearly and separately, in plain language, for a specific purpose. We do not treat silence, inactivity, or a pre-ticked box as



consent, and we do not make access to our services conditional on consent you do not need to give.

You can withdraw consent at any time, and it is easy to do so. Use the unsubscribed link in any marketing email or write to our Data Protection Officer. Withdrawal takes effect going forward; it does not make our earlier processing unlawful, and it does not affect processing that rests on a different basis, such as records we must keep by law.

7. What We Use Your Data For

We use personal data only for the purposes below. If we ever want to use it for something materially different, we will tell you first and, where the law requires it, ask for your consent.

Category	Purpose
Identity and contact data	Answering your enquiry, arranging meetings, and maintaining a record of our correspondence with you
Social media data	Responding to public posts and messages directed at our accounts
Client service data	Onboarding, providing and supporting services, managing relationships, and resolving disputes
Payment and billing data	Issuing invoices, taking and reconciling payment, and meeting accounting and tax obligations
Technical and security data	Keeping the Platform available and secure, investigating incidents, preventing fraud and abuse, and diagnosing faults
Marketing data	Sending you the updates you asked for, and honoring your preferences
Client-instructed data	Carrying out the processing the client has instructed.

8. When We Act as a Data Processor

A large part of what we do is run systems for clients. When we do, the client is the data controller: they decide why the data is collected, what happens to it and on what lawful basis. We are the data processor, and we act only on their documented written instructions.

In that role, we commit to the following, and every client contract records them under a data processing agreement:

- We process personal data only as instructed, and we tell the client if we believe an instruction breaches the NDPA;
- we apply the security measures in section 12 and impose equivalent obligations on any sub-processor;
- We engage a sub-processor only with the client's prior written authorization, and we remain responsible for its performance;
- we assist the client in responding to data subject requests, breaches, DPIAs and enquiries from the Commission;
- we notify the client of any personal data breach without undue delay; and
- At the end of the engagement we return or delete the data as the client directs, except where the law requires us to keep it.

If you contact us about data we hold only as a processor, we will not act on the request we are not permitted to. We will forward it to the controller responsible within 2 working days and confirm to you that we have done so. In appropriate cases, we will give you their contact details so you can follow up directly.

9. How Long We Keep Personal Data

We keep personal data only as long as we need it for the purpose we collected it for, or as long as the law requires. Our retention schedule is below.

Category	Retention period	Rationale
Identity and contact data (enquiries)	12 months since our last substantive contact with you	Long enough to pick up a conversation that resumes; not a permanent record of people who once wrote to us
Social media data	As long as the post or message remains on the platform; our own copies for 12 months	We do not control the platforms' own retention
Client service data	Duration of the contract, plus 6 years	Contractual limitation periods and dispute resolution
Payment, billing and accounting records	7 years from the end of the financial year to which they relate	Retention of accounting records under Nigerian company and tax legislation.

Category	Retention period	Rationale
Technical and security logs	12 months, or longer where an incident is under investigation	Security monitoring and incident forensics.
Marketing data	Until you unsubscribe, plus a permanent suppression record of your email address	A suppression list is how we make sure we do not contact you again.
Client-instructed data	As specified in the data processing agreement, then returned or deleted on the client's instruction	The client decides; we execute.

At the end of the retention period, data is securely deleted or irreversibly anonymized.

10. Who We Share Personal Data With

We do not sell personal data, and we do not share it with anyone else's marketing. We share it only as set out below.

10.1 Service providers acting as our processors

These organizations process personal data on our behalf, under a written data processing agreement. They may use it only to provide the service to us.

Category	Data shared and purpose
Cloud hosting and compute	Client service data and technical data, to host and run the Platform
Website hosting and CDN	Technical data, to serve the website
Email and productivity	Identity and contact data, correspondence
Support ticketing	Contact details and support correspondence
Payment processing and banking	Payment and billing data, to collect and reconcile payment
Marketing email delivery	Email address and preferences
Security monitoring and backup	Technical and security data

10.2 Our clients, where we act as processors

Where a client is the controller, personal data goes back to them, and to anyone they lawfully direct us to send it to.

10.3 Professional advisers and corporate transactions

We may share personal data with our lawyers, auditors and insurers where they need it and are bound by confidentiality. If we are ever involved in a merger, acquisition or sale of assets, personal data may transfer to the buyer, who will be bound by this Notice until they lawfully issue their own; we will tell you if that happens.

10.4 Law enforcement, regulators and courts

We may disclose personal data to Nigerian or foreign law enforcement, regulatory bodies or courts where we are required to by law, court order or valid legal process, or where it is necessary to protect the life or safety of any person. We check that every request is valid and properly authorized, we disclose only the minimum the request requires, and we challenge requests we consider excessive or unlawful. Where we are legally permitted to tell you about such a disclosure, we will.

11. Transfers of Personal Data Outside Nigeria

Presently, we do transfer personal data outside Nigeria. However, if the need arises, we shall comply with the NDPA requirements for cross-border transfers.

12. How We Protect Personal Data

We maintain technical and organizational measures proportionate to the sensitivity of the data we hold under our Information Security Management System. Our measures currently include:

- strong encryption of personal data at rest and in transit, using current industry-standard algorithms and protocols;
- role-based access control on a need-to-know basis, with multi-factor authentication on all privileged systems;
- just-in-time privileged access, with immutable audit logging of what was accessed and by whom;
- continuous security monitoring and alerting;
- regular independent penetration testing and a risk-based vulnerability management process with defined remediation timelines;
- routine encrypted backups with tested restoration; and
- data protection and security training for every member of staff, refreshed annually.

These measures change as technology and threats change. No system can be made completely secure, and we do not claim otherwise — which is why section 13 sets out exactly what we do when something goes wrong.

13. Personal Data Breaches

A personal data breach is a security failure that leads to accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data. We record every incident in an internal breach register, whether or not it is notifiable, and we investigate each one.

- **To the Commission.** Where a breach is likely to result in a risk to the rights and freedoms of individuals, we notify the Nigeria Data Protection Commission within 72 hours of becoming aware of it, as the NDPA requires, giving the description, categories and approximate numbers affected, likely consequences and the measures we are taking.
- **To you.** Where the breach is likely to result in a high risk to you, we contact you directly and without undue delay. We describe in plain language what happened, what data was involved, what we are doing about it and what you can do to protect yourself, and we give you the DPO's contact details.
- **To our clients.** Where we act as processors, we notify the client who is the data controller without undue delay, so they can meet their own obligations, and we support their investigation.

14. Automated Decision-Making and Profiling

We do not make decisions about you based solely on automated processing that produces legal effects concerning you or similarly significantly affects you. Any decision of that kind is taken by a person.

15. Cookies and Similar Technologies

Our website has no cookies and uses no tracking pixels, analytics scripts or advertising technologies. We re-verify this at each review of this Notice.

16. Marketing Communications

We send marketing only to people who have asked for it. Every message carries a one-click unsubscribe, and we act on it immediately. You have a right to object to direct marketing, and we simply stop.

17. Children

A child, in Nigerian law, is anyone under 18. The Heckerbella Platform is a business service and is neither directed at nor intended for children, and we do not collect their personal data.

If you are a parent or guardian and believe we hold data about a child, write to our DPO at dpo@heckerbella.com. We will investigate, and where we confirm it, we will delete the data immediately and confirm to you that we have done so.

18. Your Rights

The NDPA gives you the following rights over your personal data.

Right	Basis	What it means
To be informed	s.27	To know who we are, what we do with your data and why that is what this Notice is for. Where we did not get your data from you, you can ask us where it came from.
Of access	s.34(1)(a)	To confirm whether we hold data about you, and to receive a copy of it along with the purposes, categories, recipients and retention period.
To rectification	s.34(1)(c)	To have inaccurate data corrected and incomplete data completed. We never charge you to fix an error that is ours.
To erasure	s.34(1)(d)	To have your data deleted. Some data we must keep by law accounting records, for example and we will tell you when that applies and why.
To restriction	s.34(1)(e)	To have us pause processing while we check a challenge to accuracy, while an objection is being decided, or while a legal claim is being established or defended.

Right	Basis	What it means
To withdraw consent	s.35	Where we rely on consent, to withdraw it at any time, as easily as you gave it, without affecting the lawfulness of what came before.
To object	s.36	To object to processing based on legitimate interests or public interests. We must stop unless we can show overriding legitimate grounds. For direct marketing your objection is absolute and we stop immediately.
Regarding automated decisions	s.37	Not to be subject to a decision based solely on automated processing with legal or similarly significant effects, and to request human review, express your view and contest the outcome.
To data portability	s.38	To receive the data you provided to us, where we process it by automated means on the basis of consent or contract, in a structured, commonly used, machine-readable format such as CSV or JSON and to have it sent directly to another organization where technically feasible.
To complain	s.46(1)	To lodge a complaint with the Nigeria Data Protection Commission, and to seek a remedy in court.

19. How to Exercise Your Rights

Write to our Data Protection Officer at dpo@heckerbella.com or at the postal address in section 24 and tell us which right you want to exercise and what data it concerns.

- **Identity.** We may ask for enough information to be confident we are dealing with you and not someone else no more than we need, and we delete verification material afterwards.
- **Timing.** The NDPA requires us to act without constraints or unreasonable delay. In practice: we acknowledge within 72 hours and respond substantively within 30 calendar days. If a request is genuinely complex and we need more time, we will tell you before the 30 days expire, explain why, and give you a date.
- **Cost.** There is no charge. We will never charge you to correct an error we made.
- **Limits.** We may decline a request that is manifestly unfounded or excessive, or where answering would disclose someone else's personal data or breach a legal obligation. If we decline, in whole or in part, we will tell you which parts, why, and how to escalate. We keep a record of every request and every refusal.

20. Complaints and Redress

If you are unhappy with how we have handled your personal data or your request, you have several routes, and you do not have to use them in order.

- **Come to us first, if you are willing.** Write to dpo@heckerbella.com. We will acknowledge within 72 hours and aim to resolve the matter within 30 days.
- **Standard Notice to Address Grievance (SNAG).** Under Article 40 of GAID, you may serve us SNAG where you reasonably believe we have violated your right to privacy, requiring us to address it formally. Serving a SNAG is not a precondition for anything else you may want to do.
- **The Commission.** You may lodge a complaint with the Nigeria Data Protection Commission at ndpc.gov.ng. You do not need our permission or our involvement.
- **The courts.** You may approach the Federal High Court or a State High Court, including under the Fundamental Rights (Enforcement Procedure) Rules, and you may seek compensation for injury, loss or harm caused by a violation.

21. Accessibility and Vulnerable Data Subjects

Article 27 of the GAID requires that this information actually reach the people it concerns. The summary at the beginning of this Notice is written to be read in a minute. If you need this Notice in a different format large print, a simplified summary, or read aloud over the phone ask our Data Protection Officer, and we will provide it at no cost. Where we collect personal data in a setting where a written notice cannot practically be read, such as at an event or over the phone, we explain the key points verbally and tell you where to find the full Notice.

22. Governing Law

This Notice is governed by the laws of the Federal Republic of Nigeria. The Nigeria Data Protection Act 2023 takes priority over any other instrument on the protection of personal data, as section 63 of the Act provides. Nothing in this Notice limits any right you have under the NDPA or the Constitution.

23. Changes to This Notice

We review this Notice at least annually and whenever our practices, technology or legal obligations change materially. The current version is always published on our website, with its version number and effective date at the top. Where a change materially affects you, we will tell you by email or through a notice on the Platform

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Directors: Yemi Keri (Nigerian); T.S. Adajero (Nigerian)

before it takes effect. Continuing to use the Platform after that date means the updated Notice applies to you.

24. Contact Us

Contact	Details
Data Protection Officer	dpo@heckerbella.com
Customer support	support@Heckerbella.com
General and business enquiries	business@Heckerbella.com
Postal address	9th Floor Ibukun House, 14 Adetokunbo Ademola Street, Victoria Island Lagos, Nigeria.
Supervisory authority	Nigeria Data Protection Commission (NDPC), ndpc.gov.ng

We take every privacy query seriously and will respond within 30 calendar days of receipt.