

PRIVACY POLICY

Last Updated: March 03, 2026

1. INTRODUCTION

The Company acts as a trade intermediary, providing a secure digital platform for international trade facilitation services including brokerage, customs and logistics coordination, counterparty verification, commercial negotiation, market entry, and consulting (collectively, the “Services”).

We are committed to protecting your personal data in strict compliance with **Law No. 2019-014 of 29 October 2019 Relating to the Protection of Personal Data** (the “Togolese Data Protection Act”).

Important Disclaimer Regarding Our Role:

- We are **not** a bank, deposit-taking institution, financial institution, foreign-exchange dealer, customs broker, or investment adviser.
- All money settlements and licensed activities are carried out through **regulated financial institutions and Third-Party Providers**.

2. WHO IS THE DATA CONTROLLER?

Under Law No. 2019-014, the **Data Controller** is the entity that determines the purposes and means of processing.

- **Controller:** Maison du Commerce du Togo
- **Contact Email/Address:** info@amani-ai.com

We may act as a **Controller** for the data you provide directly to us, and as a **Processor** for certain data processed on behalf of our Users or Third-Party Providers. Specific roles are detailed below.

3. WHAT PERSONAL DATA DO WE COLLECT?

We collect only data that is **adequate, relevant, and non-excessive** in relation to the purposes of international trade facilitation.

A. Data You Provide Directly:

- Identity data (name, nationality, passport/ID number, date of birth, company registration details).
- Contact data (email, phone, business address).
- Financial data necessary for intermediary services (bank account details, VAT numbers, transaction history) – **note: we do not execute payments; we transmit instructions to regulated financial institutions**.
- Trade documentation (customs declarations, bills of lading, commercial invoices).

B. Data Collected Automatically:

- Connection logs, IP addresses, and browsing behavior on our Platform.
- Device information.

C. Data from Third Parties:

- Verification data from counterparty screening services.
- Compliance data from sanctions and watchlist checks.

4. LEGAL BASIS AND PURPOSES OF PROCESSING

Under Article 4 of Law No. 2019-014, processing is lawful only if you have consented or if it is

Purpose	Legal Basis (Togolese Law)	Data Categories
Trade Brokerage & Negotiation	Performance of a contract (Terms of Service)	Identity, commercial, financial
Customs & Logistics Intermediation	Performance of a contract; Compliance with customs regulations	Trade docs, shipment data
Counterparty Verification & Screening	Legitimate interest (fraud prevention); Legal obligation (AML/CFT if applicable)	Identity, sanctions data
New Market Entry & Consulting	Consent; Pre-contractual measures	Business strategy, contact data
Platform Security & Debugging	Legitimate interest (security)	IP addresses, logs
Compliance with IPDCP Orders	Legal obligation	Any relevant data

necessary for a contract, legal obligation, or legitimate interest.

Consent: Where we rely on consent (e.g., for marketing or optional data sharing), you have the right to withdraw consent at any time via your account settings or by contacting us.

5. DATA SHARING AND THIRD PARTY PROVIDERS

We engage **Third Party Providers** to perform the Services. These include, but are not limited to:

- Regulated financial institutions (for settlement execution – we only transmit instructions).
- Customs brokers and logistics operators.
- Credit bureaus and business verification agencies.
- Cloud infrastructure hosts.

Controller vs. Processor Distinction:

- When we share data with a Third Party Provider who acts on our **behalf** (e.g., cloud hosting), we remain the Controller and such provider is a **Processor**. We conduct due diligence to ensure they provide sufficient guarantees regarding security and compliance with Togolese law.
- When we transmit data to a **regulated financial institution** for payment execution, such institution acts as an **independent Controller**. You should review their privacy policy.

International Transfers:

Your data may be transferred to jurisdictions outside Togo. Under Law No. 2019-014, transfers to countries with less than adequate protection levels require specific safeguards. We ensure such transfers are governed by contractual clauses recognized by IPDCP or are subject to derogations (e.g., your explicit consent, contract necessity).

6. YOUR RIGHTS UNDER TOGOLESE LAW

As a data subject under Law No. 2019-014, you possess the following fundamental rights:

1. **Right to Information:** You have the right to be informed of the collection and processing of your data (fulfilled via this Policy).
2. **Right to Access:** You may request confirmation as to whether data concerning you is being processed, and receive a copy.
3. **Right to Rectification:** You may request correction of inaccurate or incomplete data.
4. **Right to Erasure (Right to be Forgotten):** You may request deletion of your data when it is no longer necessary for the original purposes, or when consent is withdrawn.
5. **Right to Object:** You may object, on legitimate grounds, to the processing of your data, including for direct marketing.
6. **Right to Post-Mortem Instructions:** You have the right to define directives regarding the retention, erasure, and communication of your personal data after your death. Successors with proven identity may require the Controller to consider the death of the data subject and make necessary updates.

How to Exercise Rights:

Send a request via email to info@amani-ai.com. We will respond within a reasonable timeframe (not to exceed the statutory limit under Togolese law, generally **30 days**). Requests for copies of data may be subject to a fee not exceeding the cost of reproduction.

7. DATA SECURITY

We implement technical and organizational measures to ensure the **confidentiality and security** of personal data, as mandated by Article 52 of Law No. 2019-014 . Measures include:

- Encryption of data in transit.
- Access controls and role-based permissions.
- Regular security audits and pseudonymization where appropriate.
- Binding our employees and processors to strict confidentiality obligations.

Breach Notification: While Law No. 2019-014 is noted by some sources to lack explicit mandatory breach notification provisions, we adhere to international best practice. In the event of a data breach likely to result in a high risk to your rights and freedoms, we will notify **both the IPDCP** and affected data subjects without undue delay.

8. DATA RETENTION

We retain personal data **only for the duration necessary** to fulfill the purposes outlined in Section 4, or as required to comply with legal obligations (e.g., customs retention laws, tax statutes).

- **Account data:** Retained for the duration of your account activity plus five (5) years following closure.
- **Transactional records:** Retained in accordance with commercial code requirements (typically 5-10 years for customs/trade records).
- **Verification data:** Retained for five (5) years to comply with anti-fraud obligations.

Upon expiration of the retention period, data is securely deleted or anonymized.

9. COOKIES AND TRACKING

Our Platform uses cookies and similar technologies to ensure functionality and security. Under Togolese law, informed consent is required for non-essential cookies.

- **Essential Cookies:** Required for platform operation (e.g., login sessions, security). These do not require prior consent.
- **Analytics/Performance Cookies:** Used to understand how Users interact with our Platform. Consent is obtained via our cookie banner.
- **Marketing Cookies:** Used to personalize content. Consent is obtained via our cookie banner.

You may manage your cookie preferences at any time via the cookie settings tool on our Platform.

10. SUPERVISORY AUTHORITY (IPDCP)

You have the right to lodge a complaint with the **Instance de Protection des Données à Caractère Personnel (IPDCP)**, the national data protection authority of Togo, if you believe your rights have been violated.

Contact:

Instance de Protection des Données à Caractère Personnel

Website: <https://ipdcp.tg/>

11. CHANGES TO THIS POLICY

We reserve the right to update this Privacy Policy to reflect changes in our data processing practices or legal obligations. In case of material changes, we will notify you via email or a prominent notice on our Platform. The “Last Updated” date at the top of this Policy will be revised.

12. CONTACT US

For any questions regarding this Privacy Policy or to exercise your rights under Togolese law, please contact:

Email: info@amani-ai.com