

# MIRI AFRICA LIMITED PRIVACY POLICY

**Effective Date:** June 17, 2026

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Version: 2.0

## 1. INTRODUCTION

Miri Africa Limited ("Miri Africa", "we", "us", or "our") is committed to protecting the privacy, confidentiality, integrity, and security of personal data entrusted to us.

This Privacy Notice explains how we collect, use, disclose, store, transfer, and otherwise process personal data when individuals interact with our products, services, websites, applications, cloud platforms, APIs, environmental monitoring systems, air quality devices, climate adaptation technologies, and related services (collectively, the "Services").

Miri Africa operates in multiple jurisdictions and may process personal data relating to individuals located in Nigeria, the European Economic Area ("EEA"), the United Kingdom, and other countries. We are committed to processing personal data in accordance with applicable data protection laws, including:

- The Nigeria Data Protection Act 2023 ("NDPA");
- The General Data Protection Regulation (EU) 2016/679 ("GDPR");
- The UK GDPR, where applicable; and
- Other applicable privacy and data protection laws.

Please read this Privacy Notice carefully to understand how we handle your personal data and your rights in relation to that data.

## 2. WHO WE ARE

Miri Africa Limited is a climate technology company that develops and deploys environmental monitoring solutions, air quality tracking systems, climate adaptation technologies, connected devices, software platforms, analytics tools, and related services.

For the purposes of applicable data protection laws, Miri Africa Limited is generally the data controller in respect of personal data collected through its Services unless otherwise stated.

### Contact Information

Miri Africa Limited

Email: [info@miri.africa](mailto:info@miri.africa)

Website: [www.miri.africa](http://www.miri.africa)

Address: 5th Floor, Providence Plaza Lekki-Epe Expressway, Lagos, Nigeria

For privacy-related enquiries, requests, or complaints, please contact us using the details above.

Where required by applicable law, Miri Africa may appoint a Data Protection Officer, Privacy Officer, or EU Representative and publish their contact details accordingly.

### **3. SCOPE OF THIS NOTICE**

This Privacy Notice applies to:

- Visitors to our websites;
- Customers and prospective customers;
- Users of our platforms, dashboards, mobile applications, and APIs;
- Users of our connected devices and environmental monitoring systems;
- Research partners and programme participants;
- Suppliers, contractors, and service providers;
- Individuals who communicate or interact with us.

### **4. DATA PROTECTION PRINCIPLES**

Miri Africa processes personal data in accordance with the following principles:

- Personal data shall be processed lawfully, fairly, and transparently;
- Personal data shall be collected for specified, explicit, and legitimate purposes;
- Personal data collected shall be adequate, relevant, and limited to what is necessary;
- Personal data shall be accurate and kept up to date where necessary;
- Personal data shall not be retained for longer than necessary;
- Personal data shall be processed securely and confidentially;
- Miri Africa shall be able to demonstrate compliance with applicable data protection obligations.

### **5. INFORMATION WE COLLECT**

Depending on the nature of your interaction with us, we may collect the following categories of information.

#### **A. Identity and Contact Information**

- Full name;
- Email address;

- Telephone number;
- Residential or business address;
- Job title;
- Employer or organisation details;
- Account credentials.

## **B. Device and Technical Information**

- IP address;
- Browser type and version;
- Device identifiers;
- Device type;
- Operating system information;
- Application version;
- Language preferences;
- Network information;
- Login records;
- System activity logs.

## **C. Usage Information**

- Pages visited;
- Features accessed;
- Platform interactions;
- Search queries;
- Session information;
- Time spent on our platforms;
- User preferences and settings.

## **D. Environmental and Sensor Data**

Our technologies may collect environmental and operational information including:

- Air quality measurements;
- Particulate matter readings;
- Carbon dioxide measurements;
- Temperature data;
- Humidity readings;

- Atmospheric pressure measurements;
- Environmental risk indicators;
- Climate and environmental monitoring data;
- Sensor performance information;
- Device health and diagnostic information.

Environmental and atmospheric data may not always constitute personal data. However, where such information can reasonably be linked to an identified or identifiable individual, household, building occupant, customer account, or device user, it will be treated as personal data and protected accordingly.

#### **E. Location Information**

Where relevant to the operation of our devices or services, we may collect:

- Device deployment locations;
- Geographic coordinates;
- Location-based environmental monitoring information.

#### **F. Communications Information**

- Support requests;
- Customer enquiries;
- Survey responses;
- Feedback submissions;
- Communications with our personnel.

#### **G. Marketing Information**

- Subscription preferences;
- Event registrations;
- Product interests;
- Marketing engagement data.

### **6. HOW WE COLLECT INFORMATION**

We collect information:

- Directly from you;
- Through your use of our Services;
- Through connected devices and sensors;
- Through cookies and similar technologies;

- From business partners and distributors;
- From publicly available sources;
- From service providers acting on our behalf.

## **7. LEGAL BASIS FOR PROCESSING**

Where required by applicable law, we process personal data on one or more of the following legal bases:

### **Contract Performance**

To provide products, services, customer support, platform access, and related contractual services.

### **Legitimate Interests**

To:

- Improve our products and services;
- Maintain platform security;
- Prevent fraud and abuse;
- Conduct analytics and product development;
- Manage customer relationships;
- Protect our legal rights.

### **Consent**

Where consent is required, including certain marketing communications, cookies, or specific data collection activities.

### **Legal Obligation**

To comply with legal, regulatory, tax, reporting, and compliance requirements.

### **Vital Interests**

Where processing is necessary to protect the life, health, or safety of an individual.

### **Public Interest**

Where processing is required for scientific, environmental, public health, sustainability, or other activities permitted by applicable law.

## **8. HOW WE USE PERSONAL DATA**

We may use personal data to:

- Create and manage user accounts;

- Provide access to our Services;
- Operate environmental monitoring systems;
- Process transactions and orders;
- Provide technical support;
- Respond to enquiries;
- Improve product performance and reliability;
- Conduct analytics and research;
- Monitor system performance and security;
- Detect and prevent fraud or misuse;
- Comply with legal obligations;
- Communicate with users;
- Send marketing communications where permitted by law.

## **9. RESEARCH, ANALYTICS AND ENVIRONMENTAL INSIGHTS**

Miri Africa may use environmental, operational, and platform data for:

- Scientific and environmental research;
- Product improvement;
- Climate adaptation initiatives;
- Environmental reporting;
- Development of aggregated environmental insights;
- Public health and sustainability initiatives;
- Climate resilience planning.

Where reasonably possible, such data will be anonymised or aggregated before being used for research, reporting, or analytical purposes.

## **10. DISCLOSURE OF PERSONAL DATA**

We do not sell personal data.

We may share personal data with:

- **Service Providers** including providers of cloud hosting and infrastructure, data storage, cybersecurity services, customer support tools, analytics services, payment processing services, communication platforms and CRM systems,
- **Business Partner** where necessary to provide products or services requested by you.

- **Professional Advisers** including lawyers, auditors, consultants, insurers, and other advisers.
- **Regulatory Authorities** where required by law or regulatory obligation.
- **Law Enforcement and Government Agencies** where disclosure is required or authorised by applicable law.
- **Corporate Transactions** in connection with mergers, acquisitions, restructurings, financing transactions, investments, or asset transfers.

All recipients are required to implement appropriate confidentiality and security safeguards.

## **11. DATA PROCESSORS AND SUB-PROCESSORS**

Miri Africa may engage carefully selected third-party service providers to assist in the delivery of its products and services.

Where a third party processes personal data on our behalf, we require such provider to:

- Process personal data only on documented instructions;
- Maintain appropriate technical and organisational security measures;
- Protect the confidentiality of personal data;
- Comply with applicable data protection laws;
- Assist Miri Africa in meeting regulatory obligations;
- Delete or return personal data upon termination of services where appropriate.

A list of significant sub-processors may be made available upon request or published on our website.

## **12. ENVIRONMENTAL MONITORING, SENSOR AND DEVICE DATA**

Miri Africa develops and deploys environmental monitoring technologies, air quality sensors, climate adaptation systems, and connected devices.

These systems may generate:

- Air quality readings;
- Particulate matter measurements;
- Carbon dioxide measurements;
- Environmental indicators;
- Device status information;

- System diagnostics;
- Deployment locations;
- Network and connectivity information;
- Environmental analytics outputs.

Environmental monitoring information is generally intended to measure environmental conditions rather than identify individuals.

However, where environmental, location, telemetry, or device information is linked to an identifiable individual, household, customer account, employee, user, or other natural person, such information will be treated as personal data and processed in accordance with this Privacy Policy.

### **13. ANONYMISED AND AGGREGATED DATA**

Miri Africa may create anonymised, aggregated, statistical, or de-identified datasets derived from information collected through its products and services.

Where information has been irreversibly anonymised such that individuals can no longer be identified, it shall cease to be personal data.

Miri Africa may use anonymised and aggregated information for:

- Environmental research;
- Climate adaptation initiatives;
- Product development;
- Scientific studies;
- Public reporting;
- Industry benchmarking;
- Service improvement;
- Business intelligence and analytics.

Miri Africa will take reasonable measures to ensure anonymised datasets cannot reasonably be re-identified.

### **14. INTERNATIONAL DATA TRANSFERS**

As a company headquartered in Nigeria and serving customers globally, personal data may be transferred across jurisdictions.

Where personal data originating from the EEA, United Kingdom, Switzerland, or other jurisdictions is transferred internationally, Miri Africa shall implement appropriate safeguards including:

- Adequacy decisions recognised under applicable law;

- Standard Contractual Clauses approved by the European Commission;
- UK International Data Transfer Agreements or Addenda where applicable;
- Binding corporate rules where applicable;
- Approved codes of conduct or certification mechanisms where available;
- Additional technical and organisational safeguards designed to protect transferred data.

Miri Africa will assess international transfers and implement supplementary measures where required by applicable law.

## 15. COOKIES AND SIMILAR TECHNOLOGIES

Our websites and platforms use cookies and similar technologies to:

- Enable platform functionality;
- Maintain security;
- Improve user experience;
- Analyse usage patterns;
- Measure platform performance.

Where required by law, users will be provided with cookie management tools allowing them to accept, reject, or customise cookie preferences.

Further information may be provided in our Cookie Notice.

## 16. DATA RETENTION

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, comply with legal and regulatory obligations, resolve disputes, enforce agreements, and protect legitimate business interests.

Typical retention periods include:

Category of Data	Retention Period
Customer account information	Duration of relationship and up to 7 years thereafter
Contracts and transaction records	Up to 7 years
Technical support records	Up to 5 years
Marketing and subscription records	Until consent is withdrawn or the individual unsubscribes, and for a limited period thereafter to maintain suppression records
Website analytics	Up to 24 months

Security and system logs	Up to 24 months
Device telemetry and diagnostics	Up to 5 years
Litigation and dispute records	Until final resolution and expiry of applicable limitation periods

Where data is no longer required, it will be securely deleted, anonymised, or destroyed.

## 17. YOUR RIGHTS

Subject to applicable law, you may have the right to:

- Access your personal data;
- Correct inaccurate or incomplete personal data;
- Request deletion of personal data;
- Restrict processing;
- Object to processing;
- Withdraw consent at any time where processing is based on consent;
- Request portability of personal data;
- Request review of certain automated decisions;
- Lodge a complaint with a competent supervisory authority.

We will respond to requests within the timeframes prescribed by applicable law.

## 18. AUTOMATED DECISION-MAKING

Miri Africa does not ordinarily make decisions producing legal or similarly significant effects solely through automated processing.

Should this change, we will provide appropriate notice and safeguards in accordance with applicable law.

## 19. CHILDREN'S PRIVACY

Our products and services are generally intended for organisations, institutions, businesses, researchers, governments, and adult users.

Where we knowingly collect personal data relating to children, we will do so in accordance with applicable legal requirements and, where necessary, obtain appropriate parental or guardian consent.

## **20. DATA PROTECTION GOVERNANCE**

Miri Africa maintains a comprehensive privacy and data protection governance framework designed to ensure ongoing compliance with applicable laws and industry best practices.

This framework includes:

- Internal privacy and data protection policies;
- Privacy-by-design and privacy-by-default principles;
- Data protection impact assessments where appropriate;
- Personnel training and awareness programmes;
- Vendor and third-party risk management procedures;
- Information security controls;
- Incident management procedures;
- Periodic compliance reviews and audits.

Privacy and data protection responsibilities are assigned to designated personnel responsible for monitoring compliance across the organisation.

## **21. PRIVACY BY DESIGN AND BY DEFAULT**

Miri Africa incorporates privacy and data protection considerations throughout the lifecycle of its products, technologies, and services.

Where appropriate, privacy risks are assessed during the design, development, deployment, and operation of products and services to ensure that:

- Personal data collection is limited to what is necessary;
- Appropriate safeguards are implemented;
- Risks are identified and mitigated;
- Individuals' rights are respected;
- Processing activities remain proportionate and lawful.

## **22. DATA SECURITY**

We maintain appropriate technical and organisational measures designed to protect personal data against unauthorised access, loss, misuse, disclosure, alteration, or destruction.

These measures include:

- Encryption of data in transit and, where appropriate, at rest;
- Access controls and authentication measures;

- Network and infrastructure security;
- Monitoring and logging systems;
- Confidentiality obligations for personnel;
- Security awareness training;
- Incident response procedures;
- Physical and logical security controls.

While we employ industry-standard safeguards, no system can be guaranteed to be completely secure.

### **23. PERSONAL DATA BREACHES**

Miri Africa maintains procedures for identifying, investigating, managing, and responding to personal data breaches.

Where required by applicable law, we will notify affected individuals and relevant regulatory authorities within applicable statutory timeframes.

### **24. REPRESENTATIVE FOR EUROPEAN USERS**

Where required under Article 27 of the GDPR, Miri Africa may appoint a representative within the European Union to act as a point of contact for supervisory authorities and data subjects regarding matters relating to GDPR compliance.

Details of any appointed representative will be published on our website and updated from time to time.

### **25. COMPLAINTS**

If you are dissatisfied with how Miri Africa processes your personal data, you may contact us in the first instance using the contact details provided below.

You also have the right to lodge a complaint with:

- The Nigeria Data Protection Commission;
- A competent supervisory authority in the European Economic Area;
- The Information Commissioner's Office in the United Kingdom, where applicable;  
or
- Any other competent data protection authority with jurisdiction over the processing of your personal data.

### **26. CHANGES TO THIS PRIVACY NOTICE**

We may update this Privacy Notice from time to time to reflect changes in our business, technologies, legal obligations, or privacy practices.

Material changes will be communicated through appropriate channels, including publication on our website or direct notification where required by law.

## **27. CONTACT US**

If you have questions, requests, or complaints regarding this Privacy Notice or our processing of personal data, please contact:

### **Miri Africa Limited**

Email: [info@miri.africa](mailto:info@miri.africa)

Website: [www.miri.africa](http://www.miri.africa)

Address: 5<sup>th</sup> Floor, Providence Plaza Lekki-Epe Expressway, Lagos, Nigeria.

Where applicable, requests may also be directed to our Data Protection Officer, Privacy Officer, or appointed EU Representative.