PRIVACY SUPPLEMENT

Nigeria Privacy Supplement

Additional information for data subjects in Nigeria, under the Nigeria Data Protection Act 2023.

BS-PRI-003 · Version 1.0 · Effective 15 October 2026 · Live
Applies to: Members and visitors in Nigeria · Governing law: Nigeria Data Protection Act 2023 · Owner: Data Protection Lead, BabuSpace Ltd

Lagos is one of the cities BabuSpace was built for. This supplement sets out how the Nigeria Data Protection Act 2023 applies to your information, and adds to the Privacy Policy (BS-POL-003).

1. Who is responsible

1.1 **Data controller:** BabuSpace Ltd, registered in England and Wales (No. 17291878), Holborn, London, United Kingdom.

1.2 The NDPA applies to us because we process the personal data of data subjects in Nigeria.

1.3 Contact: info@babuspace.uk, subject line "NDPA Request".

1.4 Where we meet the threshold for a **data controller of major importance**, we will register with the Nigeria Data Protection Commission and appoint a Data Protection Officer, and will publish those details at babuspace.uk/legal.

2. Lawful bases

We process your personal data on one of these bases, and we tell you which in BS-POL-003 §3:

- **performance of a contract** to which you are a party - running your account, taking payment, making payouts;
- **legal obligation** - tax reporting, anti-money-laundering, sanctions screening;
- **legitimate interests** - fraud prevention, platform security, service improvement, balanced against your rights;
- **consent** - marketing, and non-essential cookies. Freely given, specific, informed, and withdrawable at any time;
- **vital interests** - a safety emergency during a stay.

3. Your rights

You may:

- **request confirmation** of whether we hold your personal data, and access a copy;
- **rectify** inaccurate, incomplete or misleading data;
- **request deletion** where the data is no longer necessary, where you withdraw consent and no other basis applies, or where processing was unlawful;
- **restrict processing** while accuracy or a legitimate interests objection is being considered;
- **object** to processing based on legitimate interests, and to direct marketing at any time;
- **receive your data in a portable format**, and have it transmitted to another controller where technically feasible;
- **not be subject to a decision based solely on automated processing**, including profiling, that produces legal or similarly significant effects. See BS-PRI-007;

- **withdraw consent** at any time, without affecting the lawfulness of what we did before;
- **lodge a complaint** with the Nigeria Data Protection Commission.

3.1 We respond within **one month**, free of charge.

3.2 Deletion has limits. Where we must keep records for a tax, accounting oranti-money-laundering obligation, we restrict them rather than delete them, and use them only for that obligation.

4. Transfers out of Nigeria

4.1 Your data is transferred to the United Kingdom and to other countries where our providers operate.

4.2 We transfer only where the destination provides an adequate level of protection, or on another basis the NDPA permits - including your explicit consent after being informed of the risks, or where the transfer is necessary to perform our contract with you.

4.3 In every case we impose contractual obligations on the recipient that reflect the standard in our Privacy Policy.

4.4 You may ask us which basis we relied on for a particular transfer.

5. Breach notification

5.1 Where a personal data breach is likely to result in a risk to your rights and freedoms, we notify the **Nigeria Data Protection Commission within 72 hours** of becoming aware of it.

5.2 Where the risk to you is high, we notify you directly, describing what happened and what you can do.

6. The regulator

Nigeria Data Protection Commission (NDPC)

- ndpc.gov.ng
- info@ndpc.gov.ng

6.1 You may complain to the Commission directly, whether or not you have raised it with us.

7. Children

7.1 BabuSpace is not for anyone under 18. We do not knowingly process a child's data, and we will delete it if we learn we hold it.

8. Hosts in Nigeria

8.1 A Host is a data controller in their own right for Guest information they receive, and carries their own NDPA obligations. See BS-POL-008.

8.2 **Tax and licensing.** Our Taxes Policy (BS-POL-007) currently sets out the position for the United Kingdom and South Africa only. If you host in Nigeria, take local advice on your income tax, VAT and licensing position. We will publish a Nigerian section when we can do so accurately.

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BabuSpace Ltd · Registered in England and Wales, Company No. 17291878 · Holborn, London, United Kingdom Sits beneath the BabuSpace Privacy Policy (BS-POL-003); it adds to that Policy and does not replace it. Questions: info@babuspace.uk