

Privacy Policy for Clé Automated Voting System (CAVS)

1. Introduction

1.1 Clé Digital Services Limited ("Clé," "we," "us," or "our") is committed to protecting the privacy and personal information of individuals who interact with the Clé Automated Voting System (CAVS).

1.2 This Privacy Policy explains how we collect, use, process, store, disclose, and protect personal information when CAVS is used for Onsite Electronic Voting, Online Voting, USSD Voting, or a combination of these voting modes.

1.3 By accessing or using CAVS, you acknowledge that your personal information may be collected, processed, stored, and shared in accordance with this Privacy Policy.

2. Information We Collect

2.1 The information processed through CAVS may vary depending on the requirements and configuration of the relevant election. This may include:

- **Personal Information:** Name, email address, phone number, membership or identification number, and other information required to establish voter identity or eligibility.
- **Voter Registration Information:** Information provided by the Client or Election Administrator to register, verify, accredit, or authenticate eligible Voters.
- **Authentication Information:** Information associated with authentication methods used for an election, including unique voting credentials, OTP verification, or other authentication mechanisms where applicable.
- **Participation Information:** Information indicating whether an eligible Voter has accessed or participated in an Election, where required to prevent duplicate voting and monitor voter participation.
- **Technical and Usage Information:** IP address, device information, browser information, access times, system activity and other technical information generated through interaction with CAVS.
- **Election Administration Information:** Information relating to Election configuration, authorised Election Administrators, system activity, audit trails, and other records necessary for the administration and integrity of an Election.
- **Voting Data:** Ballots, vote tallies, Election results and related information generated through an Election. CAVS is designed to anonymise individual ballot choices so that a Voter's identity is not disclosed through ordinary Election administration or reporting.

3. How We Use Your Information

3.1 Information processed through CAVS may be used to:

- Register and verify eligible Voters.
- Authenticate access to an Election.
- Facilitate Onsite Electronic Voting, Online Voting and USSD Voting.
- Prevent duplicate or unauthorised voting.
- Monitor voter participation and Election activity.
- Record and tally votes.
- Generate Election results and reports.
- Maintain secure audit trails.
- Detect, investigate and prevent fraudulent, suspicious or unauthorised activity.
- Provide technical support and maintain the security, reliability and performance of CAVS.
- Comply with applicable legal and regulatory requirements.

4. Voter Information and Ballot Confidentiality

4.1 CAVS may process voter identity and authentication information where necessary to establish eligibility, authenticate Voters and prevent duplicate or unauthorised voting.

4.2 Voter participation information may be recorded separately from individual ballot choices to enable authorised Election Administrators to monitor participation without disclosing how an individual Voter voted.

4.3 CAVS is designed to anonymise individual ballot choices. Election results and reports are generated without disclosing the identity of individual Voters alongside their ballot choices through ordinary Election administration or reporting.

4.4 Secure audit trails may be maintained for system activity, authentication, Election administration and security purposes without compromising the confidentiality of individual ballot choices.

4.5 Clé will not intentionally disclose an individual Voter's ballot choice except where such disclosure is technically possible and required by applicable law. Where the technical configuration of a particular Election differs from the standard anonymised voting configuration, the Client shall be informed accordingly.

5. Data Sharing and Disclosure

5.1 Clé does not sell or rent personal information processed through CAVS.

5.2 Information may be shared with:

- Clients and Authorised Election Administrators: Where necessary for voter registration, accreditation, participation monitoring, Election administration, results management and reporting.
- Authorised Service Providers: Third party providers that support the operation of CAVS, including hosting, telecommunications, authentication and other technology service providers, where applicable.
- Regulatory or Legal Authorities: Where disclosure is required by applicable law, regulation, court order or other lawful authority.

5.3 Where CAVS relies on telecommunications or other third party infrastructure, including USSD or authentication services, limited information may be processed by the relevant service provider as necessary to deliver that functionality.

6. Data Security

6.1 Clé implements appropriate technical and organisational measures to protect personal information and Election data against unauthorised access, loss, alteration, disclosure or misuse.

6.2 CAVS uses security measures designed to protect the integrity and confidentiality of Elections, including encryption, authentication controls, access restrictions and secure audit trails, as applicable to the relevant voting mode and Election configuration.

6.3 Access to Election administration functions and information is restricted to authorised persons based on their assigned roles and permissions.

6.4 While Clé implements appropriate safeguards to protect information processed through CAVS, no digital system can guarantee absolute security. Users are encouraged to protect their Voting Credentials and promptly report suspected unauthorised access or security concerns.

7. Your Rights and Choices

7.1 Subject to applicable law and the nature of the relevant Election, individuals may have the right to:

- Access personal information held about them.
- Request correction of inaccurate or incomplete personal information.
- Request deletion of personal information where applicable and subject to legal, regulatory or legitimate Election record keeping requirements.
- Withdraw consent where consent is the applicable legal basis for processing.
- Request information about how their personal information is processed.

7.2 Certain requests may need to be directed to the Client or organisation conducting the Election where that organisation determines the voter information collected and the purposes for which it is processed.

7.3 Requests concerning an individual's personal information do not provide a right to access another Voter's personal information or confidential ballot information.

7.4 To exercise your rights or raise privacy concerns, please contact us at support@cle.ng.

8. Data Retention

8.1 Personal information and Election records are retained only for as long as necessary to support the relevant Election, fulfil contractual obligations, maintain appropriate Election and audit records, resolve disputes, and comply with applicable legal and regulatory requirements.

8.2 Retention periods may vary depending on the nature of the Election and the requirements agreed with the Client.

8.3 Once personal information is no longer required, it will be securely deleted or anonymised, where appropriate and subject to applicable legal or regulatory requirements.

9. Third Party Services

9.1 CAVS may rely on authorised third party services, including telecommunications, hosting, authentication or other technology providers, to support certain voting modes or functionality.

9.2 Where third party services process personal information in connection with CAVS, such processing shall be limited to what is necessary to provide the relevant service and shall be subject to applicable data protection requirements.

10. Changes to this Privacy Policy

10.1 Clé may update this Privacy Policy from time to time to reflect changes to CAVS, applicable laws, regulatory requirements or our data processing practices.

10.2 Where material changes are made, Clé may notify affected Users through the Platform, website, email or other appropriate communication channels.

11. Contact Information

11.1 For enquiries, requests or concerns regarding this Privacy Policy or the processing of personal information through CAVS, please contact:

- Email: support@cle.ng

- Phone: +234 81 111 14801

- **Address: 2 Abebe Village Road, Iganmu, Lagos, Nigeria.**

By accessing or using CAVS, you acknowledge that you have read and understood this Privacy Policy.