

Data Security Addendum

Version v0.1 · Last updated June 2026 · Hannu Technologies Limited (in formation)

Draft — pending legal counsel review. This document reflects Hannu’s intended practice and is grounded in the Nigeria Data Protection Act 2023 and the NDPC GAID 2025. It is not yet a binding agreement; the ratified version will replace it without changing where it is published.

This Data Security Addendum describes the technical and organizational measures Hannu maintains to protect personal data and the Platform. It supports the Customer Agreement and the Data Processing Addendum. Measures may be updated to keep pace with risk, provided protection is not materially reduced.

01 Encryption

Personal data is encrypted in transit (TLS) and at rest. Sensitive identity identifiers (BVN, NIN) receive field-level encryption and are additionally stored only as salted hashes; they are never logged or displayed in full, and never sent to an AI model.

02 Access control

Access follows least privilege and is scoped to the owning identity at the data layer: every query touching user or Operator data is constrained to its owner. Administrative access requires strong authentication and is logged.

03 Secure development and change control

Changes follow a reviewed software-development lifecycle. Gated capabilities ship behind admin-controlled feature flags that default off and are enabled only when their safety and quality metrics pass. The AI layer is never in the synchronous path of money movement or task acceptance.

04 Logging and monitoring

Security-relevant events are logged and monitored. Logs are designed to exclude sensitive personal data and identity identifiers.

05 Integrity of money records

Financial records use an append-only, double-entry ledger; corrections are new entries, never edits, preserving a tamper-evident history. Hannu does not custody funds.

06 **Vulnerability and incident management**

We manage vulnerabilities on a risk-prioritized basis and maintain an incident-response process. On a confirmed personal-data breach, we notify affected controllers without undue delay and support notification to the NDPC and data subjects as required.

07 **Resilience and personnel**

We maintain backups and recovery procedures. Personnel are bound by confidentiality and receive security and data-protection training appropriate to their role.

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