



PRIVACY POLICY

Centre for Clinical Care and Clinical Research (CCCRN)

(For GidaCare WhatsApp Chatbot)

www.gidacare.com

www.cccr-nigeria.org

Effective Date: 25 May 2026

1. Introduction

The Centre for Clinical Care and Clinical Research (CCCRN) operates WhatsApp-based Chatbot under the GidaCare platform, providing maternal health support and financial education to expectant mothers, caregivers, and families in Nigeria.

This Privacy Policy explains how we collect, use, disclose, and protect your personal data when you interact with GidaCare via WhatsApp.

2. Consent and Acceptance

By initiating or continuing a conversation with GidaCare, you expressly consent to the collection and processing of your personal data as described in this Policy, in accordance with the Nigeria Data Protection Regulation and the Nigeria Data Protection Act 2023. Consent is obtained through an explicit opt-in process within WhatsApp, and users are required to actively indicate agreement before accessing services.

You may withdraw your consent at any time by sending **“STOP”** or **“DELETE”** via WhatsApp, or by contacting us (see Section 20).

3. Definitions and Scope

- **“Chatbot”** refer to GidaCare WhatsApp-based services.
- **“User”** refers to any individual aged 18 years or above using the Chatbot.
- **“Personal Data”** means any information that identifies or can identify you or a child in your care.
- **“Sensitive Personal Data”** includes health-related information such as pregnancy status and immunisation records.

4. Data We Collect

We may collect the following categories of data:

- WhatsApp phone number, name, age, sex, address. This is to enable us provide users with tailored services that meet their needs only
- Chat content (e.g., pregnancy details, vaccine queries, location if voluntarily shared)
- Interaction metadata (timestamps, menu selections, usage history)

We do **not intentionally collect** financial information or precise GPS location data.

5. Purpose of Data Collection

We process your data to:

- Support immunisation planning and reminders
- Provide maternal health education and guidance
- Recommend nearby healthcare services (where applicable)
- Respond to user queries באמצעות AI-powered tools
- Improve chatbot performance and public health interventions
- Comply with applicable health and regulatory requirements

6. How We Use Your Data

Your data is used to personalise your experience, deliver relevant health information, and generate anonymised insights to improve healthcare delivery.

We do **not** use your data for marketing, advertising, or commercial resale.

7. Legal Basis for Processing

We process your personal data based on:

- Your explicit consent
- Public health interest
- Compliance with applicable laws, including the Nigeria Data Protection Regulation and Nigeria Data Protection Act

8. Data Sharing

We may share your data with:

- Public health authorities and government agencies (where required for public health purposes and in compliance with applicable laws)” (e.g., immunisation programmes)
- Trusted technical service providers (e.g., WhatsApp infrastructure, hosting providers)
- Law enforcement or regulatory bodies where required by law

All third parties are bound by strict data protection and confidentiality obligations.

We do **not** share your data with marketers or unrelated third parties.

9. Cross-Border Data Transfers

Your data may be processed outside Nigeria (e.g., via WhatsApp or cloud service providers). Where this occurs, CCCRN ensures that such transfers comply with the Nigeria Data Protection Regulation and Nigeria Data Protection Act, and that appropriate safeguards are in place to protect your data.

10. Use of Artificial Intelligence

GidaCare uses AI-powered tools (e.g., chatbot response systems) to generate automated responses. Users are informed when they are interacting with an automated system (chatbot) rather than a human.

These responses are for informational purposes only and do not constitute medical advice. Users are encouraged to consult qualified healthcare professionals for medical concerns.

11. Sensitive Health Data (Children & Pregnancy)

GidaCare processes sensitive personal data, including pregnancy information and child immunisation records.

By using the Chatbot, you confirm that you are:

- The expectant mother providing your own data; or
- A parent, guardian, or authorised caregiver providing data on behalf of a child

Such data is processed strictly for public health purposes and is subject to enhanced protection measures. GidaCare does not use sensitive health data for advertising, profiling, or commercial exploitation.

12. Your Rights

Under the Nigeria Data Protection Regulation and Nigeria Data Protection Act, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request deletion of your data
- Withdraw consent at any time
- Object to or restrict processing
- Lodge a complaint with the Nigeria Data Protection Authority

To exercise your rights, send “**DELETE**” via WhatsApp or contact us directly.

13. Data Security Measures

We implement appropriate technical and organisational measures to protect your data, including:

- WhatsApp end-to-end encryption
- Secure storage systems and access controls
- NDPR-compliant agreements with third-party providers
- Periodic security reviews and staff confidentiality training

14. Data Breach Notification

In the event of a data breach, CCCRN will notify affected users and relevant authorities in accordance with the Nigeria Data Protection Act and applicable regulatory requirements.

15. Data Retention

We retain your data for up to **six (6) months** after your last interaction.

After this period, data is securely deleted or anonymised, unless retention is required by law or for legitimate public health purposes.

16. Updates to This Policy

We may update this Privacy Policy from time to time.

Material changes will be communicated via WhatsApp or official channels. Continued use of GidaCare constitutes acceptance of the updated Policy.

17. WhatsApp Platform Compliance

GidaCare operates via WhatsApp and complies with applicable policies of Meta Platforms governing the use of the WhatsApp Business API.

By using GidaCare via WhatsApp, you acknowledge that:

- Your interactions are also subject to WhatsApp's own terms and privacy policies
- Your messages may be processed by WhatsApp to deliver the service
- CCCRN does not control WhatsApp's infrastructure or independent data practices

Users are encouraged to review WhatsApp's Privacy Policy for additional information on how their data is handled by the platform.

18. User-Initiated Messaging and Opt-In

GidaCare only communicates with users who have:

- Initiated contact via WhatsApp; or
- Provided explicit consent to receive messages

We do not send unsolicited messages or spam. Users may opt out at any time by sending "STOP".

19. Service Identification

GidaCare clearly identifies itself as a service operated by the Center for Clinical Care and Clinical Research (CCCRN) in all user interactions.

20. Contact Information

Data Protection Officer (DPO):

 dpo@cccr-nigeria.org

General Inquiries:

Centre for Clinical Care and Clinical Research (CCCRN)

 info.gidacare@cccr-nigeria.org

NDPR = Nigeria Data Protection Regulation - 2019 (issued by NITDA)

NDPA = Nigeria Data Protection Act - 2023 (signed into law by the Federal Government)