



NGelectionpolls

ELECTION MONITOR

ELECTION MONITOR • INDEPENDENT • NON-PARTISAN • CITIZEN-POWERED

DATA PRIVACY & SUBMISSION POLICY

For the NGelectionpolls platform

How NGelectionpolls collects, stores, anonymises, and shares the data you submit, and how we protect the identity of our eyewitness reporters. Aligned with the Nigeria Data Protection Regulation (NDPR).

Issued by: **The Legal Team, NGelectionpolls**

Effective June 2026

www.ngelectionpolls.org

1. ABOUT THIS POLICY

NGelectionpolls is an independent, non-partisan, citizen-powered platform. People use it to report, verify, and share what is happening at elections in real time. To do that, we collect and handle personal data, and this policy explains how.

It tells you what we collect, why we collect it, how we store and secure it, how we anonymise it before we publish anything, when we share it, and how we protect the people who report for us. It applies to everyone who uses the platform: eyewitness reporters, registered users, and visitors to our website and apps.

For the purposes of the Nigeria Data Protection Regulation (NDPR), NGelectionpolls is the **data controller** for the personal data described here. We have appointed a Data Protection Officer (DPO) who is responsible for our compliance. You can reach the DPO using the contact details at the end of this policy.

Our promises, in short

- We protect the identity of our reporters.
- We publish aggregated, anonymised results, never your personal data.
- We never sell your data, and we never share it with parties or candidates.
- You can see, correct, or delete your data at any time.
- We follow the Nigeria Data Protection Regulation (NDPR).

2. WHAT WE COLLECT AND WHY

We only collect data we actually need, and we tell you why before we collect it. The table below sets out the main categories. We also rely on a lawful basis for each use, as the NDPR requires: usually your consent, the performance of our agreement with you, a legal obligation, your vital interests, or a task carried out in the public interest.

Category	Examples	Why we collect it
Account details	Name, email, phone, password	Create and secure your account, and contact you
Reporter verification	Identity check, photo, area you cover	Confirm reporters are real and eligible, and protect platform integrity
Reports you submit	Text, photos, video, time, polling unit	Monitor and publish what happens at elections

Category	Examples	Why we collect it
Location data	Where a report was made	Tie a report to the correct polling unit
Technical data	Device, IP address, cookies, tokens	Run the service, keep it secure, and prevent abuse

We do not go looking for sensitive personal data such as your religion, health, or ethnicity. If a report you submit happens to contain such information about you or others, we treat it with extra care and limit who can see it.

3. HOW WE USE YOUR DATA

We use the data you give us to run the platform and to serve its public purpose. In practice that means we:

- Create and manage your account, and keep you signed in safely.
- Receive, check, and verify the reports you submit.
- Combine many reports into anonymised, aggregated pictures of what is happening at elections, which we then publish.
- Keep the platform secure, investigate abuse, and prevent fraud and fake reports.
- Contact you about your account, your reports, or important changes.
- Meet our legal obligations and respond to lawful requests.

We do not use your data to profile you for advertising, and we do not make decisions about you by automated means alone in a way that significantly affects you. If that ever changes, we will tell you and explain the logic involved, as the NDPR requires.

4. CONSENT AND YOUR CHOICES

Where we rely on your consent, we ask for it clearly and separately from anything else, in plain language. Your consent is yours to give and yours to take back.

- We tell you the specific purpose before we collect anything.
- You can withdraw your consent at any time. Withdrawing it does not undo processing that was lawful before you withdrew, but it stops further processing that depends on consent.
- You can object to your data being used for marketing, and we make that option free and easy to use.

- We will not make a service conditional on consent to processing that the service does not actually need.

5. HOW WE STORE AND SECURE YOUR DATA

We owe you a duty of care over your data, and we take it seriously. We protect it against theft, cyberattack, loss, and damage using measures that include:

- Encryption of data in transit and at rest.
- Firewalls, access controls, and secure, access-logged storage.
- Limiting access to the few staff who need it, under a clear internal data-handling policy.
- Securing our email and reporting systems and training our staff regularly.

We keep your data only for as long as we reasonably need it for the purpose we collected it for. Identifying details attached to reports are minimised early and removed or anonymised once they are no longer needed for verification or for the relevant election cycle. *Specific retention periods are set out in our internal retention schedule and reviewed regularly.*

6. HOW WE ANONYMISE AND PUBLISH DATA

There is an important difference between the raw reports we receive and the information we publish.

Raw submissions

Raw reports, including any photos, video, location, time, and the identity of the reporter, are treated as confidential. Access is restricted to the staff who verify and process them. We do not publish raw submissions as they arrive.

What we publish

What we share with the public is aggregated and anonymised. We combine many reports into counts, summaries, and trends for a polling unit, ward, or area. Before anything is published, we remove personal identifiers and the reporter's identity, and we strip or blur details in media that could identify a person. Where a number is so small that it could point back to one individual, we suppress or group it so that no single person or reporter can be singled out.

Anonymised, aggregated information is no longer personal data, which means it can be shared openly to serve the platform's public purpose. The link back to any individual is broken on purpose and is not meant to be reversible.

7. PROTECTING REPORTER IDENTITY

Our reporters take on real risk to keep elections transparent. Protecting who they are is one of our highest priorities.

- Each reporter is handled through a pseudonymous internal ID. Their name and contact details are stored separately from their reports and kept under tighter access controls.
- We never attach a reporter's name or contact details to anything we publish, and we never reveal them to a political party, candidate, agent, or member of the public.
- Only a small number of trained staff can link a report to the reporter behind it, and only when it is needed to verify a report or keep someone safe.
- We will not disclose a reporter's identity to anyone outside NGelectionpolls unless the law clearly requires it and we are served with a valid, lawful order. Where we are allowed to, we will tell the reporter first and challenge any request we believe is improper.
- If you believe your identity as a reporter is at risk, contact our DPO immediately and we will act to protect you.

8. WHEN AND HOW WE SHARE DATA

We do not sell your personal data. We share it only in limited, necessary cases:

- **Service providers.** We use trusted providers (for example, hosting and verification tools) who process data on our behalf. Each is bound by a written contract that requires them to follow this policy and the NDPR, and to use the data only for what we have asked.
- **Aggregated results.** We publish anonymised, aggregated information, as explained above. This is not personal data.
- **Legal and safety.** We may disclose data where the law requires it, to respond to a valid legal process, or to protect someone's life or safety.

We never share your personal data, and never a reporter's identity, with political parties, candidates, or their agents.

9. TRANSFERS OUTSIDE NIGERIA

We aim to keep your data in Nigeria. Where part of our service relies on providers outside the country, we transfer data only in line with the NDPR. That means we transfer it to a country the regulator treats as offering adequate protection, or we put proper safeguards in place. Where neither applies, we transfer your data only on a lawful basis, such as your explicit consent after we have explained the risks, or where the transfer is necessary to perform a contract with you or to protect someone's vital interests.

10. YOUR RIGHTS UNDER THE NDPR

The NDPR gives you rights over your personal data, and we make them real. You can ask us to:

- See the personal data we hold about you and how we use it.
- Correct data that is wrong or incomplete.
- Delete your data where there is no longer a lawful reason to keep it.
- Restrict or object to how we use your data in certain cases.
- Receive your data in a portable, machine-readable format, or have it sent to another controller where this is technically possible.
- Withdraw consent at any time and lodge a complaint with us or with NITDA.

To exercise any of these, contact our DPO. We will respond free of charge and act without undue delay, and in any case within one month. If we cannot act on a request, we will explain why and tell you how to complain. We may ask you to confirm your identity first, and where a request is clearly unfounded or excessive we may charge a reasonable fee or decline it and tell you why.

11. COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar tools, such as web tokens, to keep you signed in, remember your settings, keep the service secure, and understand how the platform is used. You can control non-essential cookies through your browser or device, and through any cookie settings we provide. Some cookies are needed for the platform to work and cannot be switched off.

12. CHILDREN

The platform is meant for adults. Eyewitness reporters must be at least 18. We do not knowingly collect data from children, and we will not process any data in a way that could harm a child or violate a child's rights. If we learn that we hold a child's data without a proper legal basis, we will delete it.

13. DATA BREACHES

A personal data breach is a security failure that leads to personal data being lost, destroyed, altered, or disclosed or accessed without authorisation. We have measures in place to prevent breaches and to detect them quickly. If a breach happens that puts your rights at risk, we will act without delay to contain it, assess it, notify the relevant authorities as required, and tell affected people where we are obliged to.

14. COMPLAINTS AND REDRESS

If you are unhappy with how we have handled your data, please contact our DPO first so we can try to put it right. You also have the right to complain to NITDA, which can investigate and set up an Administrative Redress Panel. A breach of the NDPR is treated as a breach of the NITDA Act, and NITDA can impose penalties on a defaulting controller. Nothing in this policy limits your right to seek redress in a court of competent jurisdiction, and no clause here protects us if we act in breach of the NDPR.

15. OUR NDPR COMMITMENTS

Beyond this policy, we hold ourselves to the operational duties the NDPR sets for data controllers:

- We have designated a Data Protection Officer, and we build our team's capacity to handle data correctly.
- We make this policy public and keep it in line with the NDPR.
- We audit our privacy and data protection practices, and where our processing crosses the thresholds in the NDPR we submit a summary of that audit to NITDA, including the annual filing due by 15 March.
- Where we use a licensed Data Protection Compliance Organisation, we cooperate with its monitoring and audits.

16. CHANGES TO THIS POLICY

We may update this policy as the platform, the law, or our practices change. When we make an important change, we will post the new version here and update the effective date, and where appropriate we will tell you directly. Please check back from time to time.

17. Contact us

For any question about this policy, your data, or to exercise your rights, contact our Data Protection Officer:

Email: admin@ngelectionpolls.org

Web: www.ngelectionpolls.org