

# KOFA AFRICA

## Cookie & Tracking Technologies Policy

Africa's Multi-Day Tour Marketplace

<https://kofa.africa/cookies>

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ePrivacy Directive (EU)	UK PECR 2003	GDPR Art. 5 & 6	NDPR 2019 / NDPA 2023
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This policy explains every cookie and tracking technology we use, why we use it, who operates it, how long it lasts, and how you can control it. You are in charge.

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# 1. About This Policy & Regulatory Scope

## 1.1 Purpose

This Cookie and Tracking Technologies Policy ('Cookie Policy') explains how Kofa Africa Limited ('Kofa Africa', 'we', 'us') uses cookies, pixel tags, web beacons, device identifiers, local storage objects, and similar tracking technologies ('cookies') when you use the Kofa Africa website at <https://kofa.africa> and our mobile applications for iOS and Android (collectively, 'the Platform').

This policy should be read alongside our Privacy Policy (<https://kofa.africa/privacy>) and our Terms of Service (<https://kofa.africa/terms>), which together form our complete data transparency framework.

## 1.2 Regulatory Scope

This policy is designed to comply with the following regulatory frameworks:

Framework	Jurisdiction	What It Requires
<b>EU ePrivacy Directive 2002/58/EC (amended)</b>	European Union / EEA	Prior informed consent before placing non-essential cookies. Clear information about cookies placed. Right to withdraw consent.
<b>UK Privacy and Electronic Communications Regulations (PECR) 2003</b>	United Kingdom	Consent required for non-essential cookies. Consent must be freely given, specific, informed, and unambiguous.
<b>GDPR Article 5(1)(a) &amp; Article 6(1)(a)</b>	EU / EEA	Consent as lawful basis for non-essential cookies. Transparency principle. Right to withdraw consent at any time.
<b>Nigeria Data Protection Regulation (NDPR) 2019 / NDPA 2023</b>	Nigeria	Lawful basis required for processing personal data via tracking technologies. Consent required where data is personal. Notice and transparency obligations.
<b>California Consumer Privacy Act (CCPA) / CPRA</b>	California, USA	Disclosure of cookies used. Right to opt out of sale or sharing of personal information via tracking technologies.

## 1.3 Relationship to Our Privacy Policy

Cookies and tracking technologies are one mechanism through which Kofa Africa collects personal data. All personal data collected via cookies is processed in accordance with our Privacy Policy. The retention periods, lawful bases, and user rights described in the Privacy Policy apply equally to data collected via cookies.

## 2. What Are Cookies & Similar Tracking Technologies

### 2.1 Cookies

Cookies are small text files that a website asks your browser to store on your device when you visit. They allow the website to recognise your device on future visits and remember information about your session, preferences, and behaviour. Cookies cannot run programs or deliver viruses to your device. Each cookie is unique to your web browser and device.

### 2.2 Tracking Technologies We Use

In addition to traditional browser cookies, Kofa Africa uses the following tracking technologies. Each is described so you understand precisely what it does:

Technology	What It Is	How We Use It
<b>Session Cookies</b>	Temporary cookies deleted when you close your browser. Stored only in your browser's memory during your session.	Authentication state, payment flow integrity, CSRF protection.
<b>Persistent Cookies</b>	Cookies with an expiry date that remain on your device between browser sessions until they expire or are deleted.	Remembering your preferences, login state, currency setting.
<b>First-Party Cookies</b>	Cookies set directly by Kofa Africa (kofa.africa domain) through our own Platform code.	All essential, functional, and Kofa Africa analytics cookies.
<b>Third-Party Cookies</b>	Cookies set by third-party domains (e.g., Google, Meta) embedded in the Platform through scripts or pixels.	Analytics, advertising, social sharing. Governed partly by the third party's own privacy policy.
<b>Pixel Tags / Web Beacons</b>	Invisible 1x1 pixel images embedded in web pages or emails. When loaded, they signal to the pixel owner that the page or email was viewed.	Measuring email open rates and advertising campaign effectiveness.
<b>Local Storage Objects (LSOs)</b>	Browser storage mechanisms (localStorage, sessionStorage) that can store data on your device, similar to cookies but with larger capacity.	Storing user preferences, application state, and draft form data.
<b>Device Fingerprinting (limited)</b>	Collecting a combination of device characteristics (screen resolution, browser version, OS) to create a probabilistic device identifier.	Fraud prevention only. Not used for advertising profiling.
<b>Mobile SDKs</b>	Software development kits embedded in the Kofa Africa mobile app that collect usage and event data from the app session.	App analytics, crash reporting, push notification delivery. Detailed in Section 9.

## 2.3 What Cookies Cannot Do

To be clear about what our cookies cannot do:

- Cookies cannot access other files on your device or read data from other websites.
- Cookies cannot install software or execute code on your device.
- Kofa Africa cookies cannot read cookies set by other websites on your device.
- Strictly necessary cookies do not collect personal data beyond what is necessary for session security.

### 3. Cookie Categories at a Glance

Kofa Africa uses four categories of cookies. The table below summarises each category, whether consent is required, and the consequence of refusing or withdrawing consent.

Category	Consent	Description & Consequence of Refusal
<b>1. Strictly Necessary</b>	<b>No Consent Required</b>	Essential to the basic operation of the Platform. Without these cookies, you cannot log in, complete a booking, or process a payment. These cookies cannot be switched off. Legal basis: Legitimate Interest (NDPR / GDPR) / Strictly necessary exemption (ePrivacy / PECR).
<b>2. Functional</b>	<b>No Consent Required</b>	Remember your preferences and improve usability (language, currency, recently viewed listings). Do not track you across third-party websites. Refusing these cookies means preferences will not be saved between sessions. Legal basis: Legitimate Interest.
<b>3. Analytics &amp; Performance</b>	<b>Consent Required</b>	Collect anonymised or pseudonymised data about how the Platform is used to improve performance and user experience. If you decline, we rely on aggregate server-side metrics only and cannot conduct granular user journey analysis. Legal basis: Consent.
<b>4. Marketing &amp; Retargeting</b>	<b>Consent Required</b>	Enable Kofa Africa to show you relevant advertisements on third-party websites and social media platforms after you visit the Platform. If you decline, you may still see Kofa Africa adverts but they will not be personalised based on your Platform behaviour. Legal basis: Consent.

*Kofa Africa does not use cookies to build advertising profiles that are sold to third-party data brokers. Marketing cookies enable Kofa Africa's own retargeting campaigns only.*

## 4. Strictly Necessary Cookies - Full Register

These cookies are essential for the Platform to function. They are set by Kofa Africa (first-party) and cannot be disabled through our Cookie Preference Centre. They do not collect data used for advertising or tracking across other websites.

Cookie Name	Set By	Category	Purpose	Data Collected	Retention
kfa_session	Kofa Africa	Strictly Necessary	Maintains authenticated user session across pages. Required for login persistence within a single browser session.	Session token (hashed, non-identifying)	Session (deleted on browser close)
kfa_auth_token	Kofa Africa	Strictly Necessary	Stores encrypted authentication token for logged-in users to avoid repeated login prompts within the 30-day session window.	Encrypted auth token	30 days
kfa_csrf	Kofa Africa	Strictly Necessary	Cross-Site Request Forgery protection token. Validates that form submissions originate from legitimate Platform sessions. Required for booking and payment forms.	Random token (non-identifying)	Session
kfa_cart	Kofa Africa	Strictly Necessary	Preserves booking basket state (selected tour, date, participants) during the checkout flow. Lost if deleted before checkout completion.	Tour ID, date, participant count	Session / 2 hours
kfa_pay_state	Kofa Africa	Strictly Necessary	Tracks payment flow state to prevent duplicate charge submission and enable recovery from payment interruptions.	Booking reference, payment stage flag	Session / 1 hour
kfa_consent	Kofa Africa	Strictly Necessary	Records the user's cookie consent preferences to avoid re-displaying the consent banner on every page load.	Consent choices per category (no personal data)	12 months
kfa_lb	Kofa Africa	Strictly Necessary	Load balancer routing cookie. Ensures requests from the same session are routed to the same server for consistency.	Server ID (not personal)	Session
__Secure-pstk	Paystack	Strictly Necessary	Payment session token issued by Paystack during checkout. Required to complete	Paystack session token	Session

Cookie Name	Set By	Category	Purpose	Data Collected	Retention
			card payment flow. Set only on payment pages.		
<b>__Secure-fwpay</b>	Flutterwave	<i>Strictly Necessary</i>	Payment session token issued by Flutterwave during checkout. Required for alternative payment methods. Set only on payment pages.	Flutterwave session token	Session

## 5. Functional Cookies - Full Register

Functional cookies remember your preferences and improve usability. They do not track you across third-party websites and do not contribute to advertising profiles. They are set on our Legitimate Interest basis and cannot be disabled through the standard Cookie Preference Centre, though you may delete them via your browser settings.

Cookie Name	Set By	Category	Purpose	Data Collected	Retention
<b>kfa_currency</b>	Kofa Africa	<i>Functional</i>	Remembers the user's selected display currency (NGN or USD) so they do not need to reset it on each visit.	Currency code (NGN/USD)	12 months
<b>kfa_lang</b>	Kofa Africa	<i>Functional</i>	Stores language preference. Currently English only at MVP launch. Reserved for future multi-language support.	Language code	12 months
<b>kfa_recent_views</b>	Kofa Africa	<i>Functional</i>	Stores a list of recently viewed Tour Experience listing IDs to power the 'Recently Viewed' feature on the home feed.	Array of listing IDs (non-personally identifying)	30 days
<b>kfa_search_hist</b>	Kofa Africa	<i>Functional</i>	Stores recent search queries entered by the user to populate search history dropdown suggestions.	Last 10 search strings	30 days
<b>kfa_ui_prefs</b>	Kofa Africa	<i>Functional</i>	Stores UI preferences such as list vs. grid view, sort order preference, and filter panel open/closed state.	UI state flags	6 months
<b>kfa_notif_dismiss</b>	Kofa Africa	<i>Functional</i>	Records which in-app banners or promotional notifications the user has dismissed to avoid repeated display.	Dismissed notification IDs	30 days

## 6. Analytics & Performance Cookies - Full Register

Analytics cookies help us understand how visitors use the Platform so we can improve it. Data is collected in aggregated or pseudonymised form. These cookies require your consent. If you decline, we continue to collect anonymised server-side analytics but lose visibility into individual user journeys.

*All analytics providers listed below are engaged as Data Processors under Data Processing Agreements. They are contractually prohibited from using your data for their own purposes or combining it with data from other sources for profiling. IP addresses are anonymised before processing.*

Cookie Name	Set By	Category	Purpose	Data Collected	Retention
<b>_ga</b>	Google Analytics	<i>Analytics</i>	Distinguishes unique users by assigning a randomly generated client ID. Used to calculate visitor, session, and campaign data for site analytics.	Pseudonymous client ID, anonymised IP	13 months
<b>_ga_[ID]</b>	Google Analytics	<i>Analytics</i>	Session state cookie for Google Analytics 4. Stores session-level data including page sequence and event triggers within a single visit.	Session state, event data	13 months
<b>_gid</b>	Google Analytics	<i>Analytics</i>	Distinguishes users for a 24-hour reporting window. Used alongside <b>_ga</b> for daily user count calculations.	Pseudonymous user ID	24 hours
<b>_gat_UA-[ID]</b>	Google Analytics	<i>Analytics</i>	Throttles request rate to Google Analytics servers to prevent performance degradation on high-traffic pages.	Boolean flag	1 minute
<b>mp_[token]_mixpanel</b>	Mixpanel (or equivalent product analytics tool)	<i>Analytics</i>	Powers product analytics including funnel analysis, feature adoption tracking, and cohort retention reporting. Helps identify where users drop off in the booking flow.	Pseudonymous distinct_id, event properties, page URL	13 months
<b>ajs_user_id</b>	Mixpanel / Segment	<i>Analytics</i>	Stores the pseudonymous analytics user ID for linking events across	Pseudonymous user ID	13 months

Cookie Name	Set By	Category	Purpose	Data Collected	Retention
			sessions once the user is identified (e.g., after login). Does not store name or email.		
<b>ajs_anonymous_id</b>	Mixpanel / Segment	<i>Analytics</i>	Stores an anonymous ID for unidentified pre-login users, enabling session continuity in funnel analysis.	Anonymous UUID	13 months
<b>kfa_perf</b>	Kofa Africa	<i>Performance</i>	First-party performance monitoring cookie tracking page load timelines, API response times, and client-side errors for engineering performance dashboards.	Page ID, load time (ms), error codes	30 days
<b>kfa_ab_[exp]</b>	Kofa Africa	<i>A/B Testing</i>	Assigns the user to a variant in an A/B or multivariate experiment (e.g., homepage layout test). Ensures consistent variant display across sessions.	Experiment ID, variant assignment flag	Experiment duration (max 90 days)

## 7. Marketing & Retargeting Cookies - Full Register

Marketing cookies enable Kofa Africa to show you relevant advertisements after you have visited the Platform. They track your browsing activity across third-party websites and social media platforms. These cookies require your explicit consent. They are operated by third-party advertising platforms who act as independent data controllers in respect of the data they collect.

*If you decline marketing cookies, Kofa Africa may still advertise to you through contextual targeting (advertises placed based on the content of the page you are viewing, not your personal browsing history). You may still see Kofa Africa adverts on social media based on those platforms' own data, which is governed by their privacy policies.*

Cookie Name	Set By	Category	Purpose	Data Collected	Retention
<b>_fbp</b>	Meta (Facebook)	Marketing	Facebook Pixel visitor cookie. Used by Meta to track conversions from Facebook Ads and build retargeting audiences of Platform visitors for Kofa Africa's advertising campaigns.	Browser ID, anonymised visit events	90 days
<b>_fbclid</b>	Meta (Facebook)	Marketing	Stores the click ID from a Facebook ad click that led to the Platform visit. Used to attribute conversions back to specific Meta ad campaigns.	Facebook click ID (fbclid)	90 days
<b>_ttt</b>	TikTok Pixel	Marketing	TikTok Pixel visitor cookie for conversion tracking and retargeting. Enables Kofa Africa to measure which TikTok campaigns drive Platform visits and bookings.	Browser ID, anonymised event data	13 months
<b>ttclid</b>	TikTok	Marketing	Stores the click ID from a TikTok ad that drove the Platform visit for conversion attribution.	TikTok click ID	7 days
<b>_gclid</b>	Google Ads	Marketing	Google Ads conversion linker cookie. Links ad clicks to site actions (for example, a booking completion) to measure Google Ads campaign ROI.	Google Ads click ID	90 days
<b>_gclid</b>	Google Ads	Marketing	Stores the Google Ads click ID (gclid) to attribute conversions to specific search or display campaigns.	Google click ID (gclid)	90 days

Cookie Name	Set By	Category	Purpose	Data Collected	Retention
<b>IDE</b>	Google DoubleClick	<i>Marketing</i>	Used by Google's Display Network for retargeting. Shows Kofa Africa adverts to previous Platform visitors across Google partner websites.	Pseudonymous user ID	13 months
<b>NID</b>	Google	<i>Marketing</i>	Google cookie used for retargeting via Google Display Network and YouTube. Stores preferences and tracks visits to Google sites.	Pseudonymous user ID	6 months

## 8. Social Media Pixels & SDKs

### 8.1 Overview

Kofa Africa embeds social media pixels on its web Platform to measure the effectiveness of our social media marketing campaigns and to enable social sharing features. These pixels are operated by third-party social media companies as independent data controllers. Their data collection is governed by their own privacy policies, which we link to below.

Platform	Pixel / SDK	What It Does	Their Privacy Policy
<b>Meta / Instagram</b>	Meta Pixel (fbq)	Tracks page views, Platform events (listing view, booking initiation, booking completion) and reports them to Meta for campaign attribution and audience building.	<a href="https://facebook.com/privacy/policy">facebook.com/privacy/policy</a>
<b>TikTok</b>	TikTok Pixel (ttq)	Tracks Platform visits and conversion events for TikTok for Business campaign measurement. Critical channel given Gen Z discovery behaviour.	<a href="https://tiktok.com/legal/privacy-policy">tiktok.com/legal/privacy-policy</a>
<b>Google / YouTube</b>	Google Tag Manager + gTag	Manages all Google tracking tags in a single container including Google Analytics 4, Google Ads conversion tracking, and Display Network remarketing.	<a href="https://policies.google.com/privacy">policies.google.com/privacy</a>
<b>X (Twitter)</b>	X Pixel (twq) - future activation	Reserved for future campaign activation. Not active at MVP launch. Will be added to cookie register if activated.	<a href="https://twitter.com/en/privacy">twitter.com/en/privacy</a>

### 8.2 Social Media Pixel Data Minimisation

Kofa Africa implements the following data minimisation measures for all social media pixels:

- Advanced Matching is disabled by default on the Meta Pixel. We do not pass hashed email addresses, phone numbers, or names to Meta without the user's explicit consent to personalised advertising.
- TikTok Pixel is configured to exclude personally identifiable parameters from event payloads.

- We do not use pixel data to build psychographic or demographic profiles beyond those necessary for campaign audience creation.

## 9. Mobile App Tracking Technologies

### 9.1 App Tracking vs Web Cookies

The Kofa Africa mobile apps (iOS and Android) do not use browser cookies. Instead, they use device-level tracking technologies including device identifiers, mobile SDKs, and app-level local storage. This section documents all mobile tracking technologies used.

### 9.2 Mobile Consent Framework

On iOS (iOS 14.5 and above), Kofa Africa requests your consent via Apple's App Tracking Transparency (ATT) framework before accessing your device's IDFA (Identifier for Advertisers) for any marketing or cross-app tracking purpose. Declining the ATT prompt limits advertising personalisation but does not affect core app functionality.

On Android, Kofa Africa respects the Google Advertising ID (GAID) opt-out setting accessible in your device settings under Google > Ads > Delete advertising ID (Android 12+) or Opt out of Ads Personalisation (earlier versions).

Technology	Platform	Purpose	Data Collected	Opt-Out Mechanism
<b>IDFA (Identifier for Advertisers)</b>	iOS	Attribution of app installs and in-app conversions to specific advertising campaigns. Only collected with ATT consent.	Device advertising identifier	iOS ATT prompt / Settings > Privacy & Security > Tracking
<b>GAID (Google Advertising ID)</b>	Android	Advertising attribution and remarketing on Android devices.	Device advertising identifier	Settings > Google > Ads
<b>Firebase Analytics SDK</b>	iOS + Android	App usage analytics: screen views, feature events, booking funnel steps, crash reporting. Pseudonymous instance IDs.	Instance ID, event data, device model, OS version	Analytics data collection can be disabled in app settings
<b>Firebase Crashlytics</b>	iOS + Android	Crash reporting and stability monitoring. Collects stack traces and device state at the time of a crash to enable engineering fixes.	Crash logs, device state, OS version (no personal data)	Disabled if analytics collection is disabled
<b>Push Notification Token</b>	iOS + Android	Unique token registered with Apple Push Notification Service (APNs) or Firebase Cloud Messaging	Device push token (non-identifying)	Disable notifications in device Settings

Technology	Platform	Purpose	Data Collected	Opt-Out Mechanism
		(FCM) to enable delivery of booking and trip notifications.		
<b>App Local Storage</b>	iOS + Android	Stores user preferences, authentication tokens, cached listing data, and offline booking drafts on-device for performance and offline functionality.	Auth token, preferences, cached data	Cleared when app is uninstalled

## 10. Third-Party Cookies & Kofa Africa's Responsibility

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### 10.1 Kofa Africa's Role

When Kofa Africa embeds third-party scripts, pixels, or SDKs on the Platform, the third-party operator sets cookies as an independent or joint data controller alongside Kofa Africa. Kofa Africa exercises the following controls over third-party cookies:

- Third-party scripts are loaded only after obtaining your consent where the cookie category requires it.
- All analytics providers are engaged under Data Processing Agreements restricting their use of data to Kofa Africa's instructions.
- Advertising platforms (Meta, TikTok, Google) act as independent data controllers in respect of the data they collect via their pixels. Their data collection is subject to their own privacy policies.
- Kofa Africa reviews third-party cookies on a quarterly basis and removes scripts for services no longer in use.

### 10.2 Third-Party Privacy Policies

For any cookie set by a third party operating as an independent data controller, Kofa Africa is not responsible for that party's data practices beyond the consent gate and contractual obligations we impose. You can exercise your rights in respect of data held by third-party platforms directly with those platforms using the links in Section 8.

### 10.3 Embedded Content

Where Kofa Africa pages include embedded content from third-party sources (for example, YouTube videos for destination previews or Google Maps for meeting point locations), those third parties may set their own cookies when the embedded content is loaded. These cookies are only set if you interact with the embedded content. They are governed by the third party's own cookie policy.

## 11. Cookie Consent Mechanism

### 11.1 Consent Banner

When you first visit <https://kofa.africa>, you are presented with a cookie consent banner ('Consent Banner') that:

- Clearly describes the four cookie categories (Strictly Necessary, Functional, Analytics, Marketing).
- Provides granular toggle controls allowing you to accept or decline each non-essential category independently.
- Defaults all non-essential categories to OFF. You must take an affirmative action to enable analytics or marketing cookies.
- Provides a link to this full Cookie Policy for detailed information before consent is given.
- Does not use dark patterns: the 'Decline All' option is as prominent as the 'Accept All' option.

### 11.2 Consent Standards

Kofa Africa's cookie consent mechanism meets the following legal standards:

Standard	Requirement	How We Meet It
<b>Freely Given</b>	Consent must not be conditional on accepting cookies to access the service.	Declining all non-essential cookies does not prevent access to the Platform or restrict core functionality.
<b>Specific</b>	Consent must be obtained separately for each cookie category.	Granular category toggles. Accepting analytics does not imply consent to marketing.
<b>Informed</b>	Users must know what they are consenting to before consenting.	Category descriptions and link to this full Cookie Policy displayed before any consent action.
<b>Unambiguous</b>	Consent requires a clear affirmative action. Pre-ticked boxes are not permitted.	All non-essential categories default to OFF. No pre-selection.
<b>Withdrawable</b>	Withdrawal of consent must be as easy as giving it.	Cookie Preference Centre accessible at all times via the footer link at <a href="https://kofa.africa/cookies">https://kofa.africa/cookies</a> .
<b>Auditable</b>	Kofa Africa must be able to demonstrate consent was obtained.	Consent records stored in kfa_consent cookie and server-side consent log tied to session. Records retained for 3 years.

### 11.3 Consent for Returning Visitors

Your cookie consent preferences are stored in the kfa\_consent cookie (strictly necessary, 12-month retention). On return visits within 12 months, the Consent Banner is not re-displayed unless: your stored preferences have expired, you have cleared your browser cookies, or we have made material changes to our cookie usage that require fresh consent.

#### **11.4 Consent Refresh**

Kofa Africa will request fresh consent from all users in any of the following circumstances:

- We add a new cookie category or a materially new third-party cookie.
- The purpose of an existing cookie changes materially.
- A significant period (more than 12 months) has passed since consent was last given.

## 12. How to Manage & Withdraw Cookie Consent

### 12.1 Kofa Africa Cookie Preference Centre

You can view and update your cookie preferences at any time by visiting <https://kofa.africa/cookies> or clicking the 'Cookie Settings' link in the footer of every Platform page. Changes take effect immediately. Withdrawing consent stops new data collection from that moment; it does not delete data already collected before withdrawal.

### 12.2 Browser-Level Cookie Management

You can also manage cookies through your browser settings. Note that blocking all cookies via browser settings will impair the functionality of the Platform, including your ability to log in and complete bookings. Browser-specific instructions:

Browser	Settings Path	Browser	Settings Path
<b>Google Chrome</b>	Settings > Privacy and Security > Cookies and other site data	<b>Mozilla Firefox</b>	Settings > Privacy & Security > Cookies and Site Data
<b>Apple Safari</b>	Preferences > Privacy > Manage Website Data	<b>Microsoft Edge</b>	Settings > Cookies and site permissions > Manage and delete cookies
<b>Opera</b>	Settings > Advanced > Privacy & Security > Cookies	<b>Brave</b>	Settings > Privacy and Security > Cookies and other site data

### 12.3 Opting Out of Third-Party Advertising Cookies

In addition to our Consent Centre, you can opt out of interest-based advertising from specific third parties through the following mechanisms:

- Google Ads: <https://adssettings.google.com>
- Meta / Facebook: Settings > Ads > Ad Preferences on your Facebook account
- TikTok: Settings and Privacy > Privacy > Ads Authorisation
- Digital Advertising Alliance (DAA) opt-out tool: <https://optout.aboutads.info>
- Network Advertising Initiative (NAI) opt-out: <https://optout.networkadvertising.org>
- European Interactive Digital Advertising Alliance (EDAA): <https://www.youronlinechoices.eu>

### 12.4 Mobile App Tracking Opt-Out

To opt out of tracking on the Kofa Africa mobile app:

- iOS: Settings > Privacy & Security > Tracking > toggle off Kofa Africa, or decline the ATT prompt when shown.
- Android: Settings > Google > Ads > Delete advertising ID (Android 12+), or Opt out of Ads Personalisation on earlier versions.
- In-App: Settings > Privacy > Analytics and Personalisation toggles within the Kofa Africa app.



## 13. Do Not Track & Global Privacy Control

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### 13.1 Do Not Track (DNT)

Kofa Africa respects the browser Do Not Track (DNT) signal. Where a DNT signal is detected from your browser, we will not activate analytics or marketing cookies in your session, regardless of your stored consent preferences. This is our voluntary commitment above and beyond what is legally required in most jurisdictions.

### 13.2 Global Privacy Control (GPC)

The Global Privacy Control (GPC) is a browser-level signal indicating a user's preference to opt out of the sale or sharing of their personal data. Kofa Africa honours GPC signals as follows:

- A GPC signal will be treated as equivalent to declining all marketing and retargeting cookies.
- It will not affect strictly necessary or functional cookies.
- For California residents, a GPC signal is treated as a valid 'Do Not Sell or Share' request under the CCPA/CPRA.

### 13.3 Limitations

DNT and GPC signals only affect Kofa Africa's own cookie deployment. They do not prevent social media platforms from collecting data about you through their own mechanisms when you visit those platforms. For complete control over third-party advertising data, use the direct opt-out mechanisms listed in Section 12.3.

## 14. International Transfers via Cookies

### 14.1 Where Cookie Data Is Processed

Data collected through Kofa Africa's first-party cookies is processed primarily in Nigerian and African cloud infrastructure. Data collected through third-party cookies (Google, Meta, TikTok) is processed by those companies on their global infrastructure, which may include servers in the United States and other countries outside Nigeria and the EEA.

### 14.2 Transfer Safeguards

For first-party analytics and functional cookie data transferred outside Nigeria, Kofa Africa applies the transfer safeguards described in Section 8 of our Privacy Policy (Standard Contractual Clauses, NDPR cross-border transfer agreements). For third-party platforms operating as independent data controllers, you should refer to their own transfer safeguard disclosures.

Cookie Operator	Processing Location	Transfer Mechanism	Reference
<b>Kofa Africa (first-party)</b>	Nigeria / Africa region (primary)	NDPR cross-border rules apply if data leaves Nigeria	Privacy Policy Section 8
<b>Google Analytics</b>	USA / Global	Google's EU SCCs and Data Processing Terms	<a href="https://policies.google.com/privacy">policies.google.com/privacy</a>
<b>Meta Pixel</b>	USA / Global	Meta's EU SCCs and Data Transfer Addendum	<a href="https://facebook.com/legal/EU_data_transfer_addendum">facebook.com/legal/EU_data_transfer_addendum</a>
<b>TikTok Pixel</b>	USA / Singapore / Global	TikTok's Data Processing Agreement and SCCs	<a href="https://tiktok.com/legal/privacy-policy">tiktok.com/legal/privacy-policy</a>
<b>Firebase (Google)</b>	USA / Global	Google's EU SCCs	<a href="https://firebase.google.com/support/privacy">firebase.google.com/support/privacy</a>

## 15. Changes to This Policy

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### 15.1 When We Update This Policy

We update this Cookie Policy when:

- We add new cookies or tracking technologies to the Platform.
- We remove cookies or change their purpose materially.
- Applicable cookie law or regulatory guidance changes.
- A new third-party service we integrate sets cookies on the Platform.

### 15.2 How We Notify You

For material changes to this policy that affect how we use your data or require fresh consent, we will:

- Display a notification on the Cookie Consent Banner on your next Platform visit.
- Update the 'Effective Date' on this policy.
- Send an email notification to registered users for significant changes to non-essential cookie use.

For minor changes such as adding a new cookie within an existing category with an equivalent purpose, we will update this register and the 'Effective Date' without displaying a new consent banner.

### 15.3 Historical Versions

Previous versions of this Cookie Policy are archived and available on request from [privacy@kofa.africa](mailto:privacy@kofa.africa).  
Version history:

Version	Effective Date	Summary of Changes
1.0	Q4 2026	Initial publication. Full cookie register for MVP Platform launch covering web and mobile app.

## 16. Contact & Complaints

### 16.1 Cookie Enquiries

For any questions about this Cookie Policy, how we use tracking technologies, or to exercise your rights in relation to cookie-collected data, contact:

Contact Type	Details
Cookie & Tracking Enquiries	privacy@kofa.africa   Subject: Cookie Policy Enquiry
Data Protection Officer	dpo@kofa.africa   Subject: DPO - Cookie Enquiry
Cookie Preference Centre	<a href="https://kofa.africa/cookies">https://kofa.africa/cookies</a>
Response Timeline	Acknowledgement within 72 hours. Substantive response within 30 calendar days.

### 16.2 Supervisory Authority Complaints

If you believe our use of cookies violates applicable law and we have not resolved your concern directly, you may complain to the relevant supervisory authority:

- Nigeria: Nigeria Data Protection Commission (NDPC) - [ndpc.gov.ng](http://ndpc.gov.ng)
- European Union: The data protection authority in your EU member state of residence.
- United Kingdom: Information Commissioner's Office (ICO) - [ico.org.uk](http://ico.org.uk)
- California: California Privacy Protection Agency (CPPA) - [cppa.ca.gov](http://cppa.ca.gov)

**END OF COOKIE POLICY | KOFA AFRICA | <https://kofa.africa/cookies>**

Kofa Africa Limited | Version 1.0 | Effective Q4 2026 | ePrivacy / GDPR / UK PECR / NDPR Compliant