

CLAVIS Health Technologies Limited ("CLAVIS", "we", "us", or "our") is committed to protecting the privacy and security of your personal data. This Privacy Policy explains how we collect, use, store, and protect information when you use our medical result verification platform at [clavishealth.ng](https://clavishealth.ng). By using our platform, you agree to the terms of this Privacy Policy.

## 1. Who We Are

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CLAVIS Health Technologies Limited is a health technology company registered in Nigeria (RC: 9594319), with its principal place of business at Lekki Phase 1, Lagos State. We operate Nigeria's first medical result verification platform, enabling healthcare providers to issue tamper-proof verification codes for medical test results.

## 2. Information We Collect

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We collect the following categories of information:

### From Healthcare Providers (Labs and Hospitals):

- Institution name, address, and contact details
- Staff account credentials (name and email)
- Result metadata — test type, date of issue, result status (Normal/Abnormal)
- Institution verification code and audit activity

### From Patients:

- Name and phone number (provided by the issuing healthcare provider)
- Patient portal login credentials if the patient registers
- Verification consent preferences and time window settings
- Notification preferences

### From Third-Party Verifiers (Employers, HMOs, Embassies):

- Name, organisation, and role (entered voluntarily during verification)
- The CLV code entered for verification
- IP address and timestamp of verification attempt

### What We Do NOT Collect:

- Clinical data — diagnoses, treatment notes, specific test values, or medical history
- Financial information beyond what is required for payment processing
- Biometric data

## 3. How We Use Your Information

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We use collected information for the following purposes:

- To generate and manage CLV verification codes for medical results

- To process verification requests and return authenticity status
- To maintain an immutable audit trail of all verification activity
- To send automated notifications to patients when their results are verified
- To manage healthcare provider accounts and billing
- To comply with applicable Nigerian laws and regulatory requirements
- To detect and prevent fraudulent use of the platform
- To improve platform performance and user experience

## 4. Legal Basis for Processing

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We process personal data in accordance with the Nigeria Data Protection Act 2023 (NDPA) and the Nigeria Data Protection Regulation (NDPR). Our legal bases for processing include:

- Contractual necessity — to provide verification services to registered healthcare providers
- Legitimate interests — to maintain platform security and prevent fraud
- Consent — where patients voluntarily register and configure their verification preferences
- Legal obligation — to comply with applicable Nigerian healthcare and data protection laws

## 5. Data Sharing and Disclosure

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CLAVIS does not sell, rent, or trade your personal data to any third party. We may share information only in the following limited circumstances:

- With healthcare providers — only data relating to results they issued
- With third-party verifiers — only the authenticity status of a result (AUTHENTIC, NOT FOUND, EXPIRED, or REVOKED) — never clinical content
- With payment processors (Paystack) — only information necessary to process transactions
- With regulatory authorities — where required by Nigerian law or court order
- With cloud infrastructure providers — under strict data processing agreements

## 6. Data Residency and Security

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All personal data collected by CLAVIS is stored on servers located within Nigeria or in jurisdictions with equivalent data protection standards, in compliance with the NDPA 2023. We implement the following security measures:

- End-to-end encryption for all data in transit (TLS 1.2 or higher)
- Encryption at rest for all patient-linked records
- Role-based access controls — staff can only access data relevant to their function
- Immutable audit logs — no verification record can be deleted or edited
- Regular security reviews and penetration testing

## 7. Your Rights as a Data Subject

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Under the Nigeria Data Protection Act 2023, you have the following rights regarding your personal data:

- Right to access — request a copy of the personal data we hold about you
- Right to rectification — request correction of inaccurate data
- Right to erasure — request deletion of your data where legally permissible

- Right to restrict processing — limit how we use your data in certain circumstances
- Right to data portability — receive your data in a structured, machine-readable format
- Right to withdraw consent — where processing is based on consent, withdraw it at any time

For patients specifically, you may revoke verification access to your CLV codes at any time through your patient portal, with immediate effect.

## 8. Data Retention

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We retain personal data for as long as necessary to provide our services and comply with legal obligations:

- Healthcare provider account data — retained for the duration of the partnership and 7 years thereafter
- Verification audit logs — retained indefinitely as required for compliance and fraud prevention
- Patient portal data — retained until the patient requests deletion, subject to legal obligations
- Third-party verifier data — retained in audit logs indefinitely

## 9. Cookies and Analytics

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Our website (clavishealth.ng) uses minimal cookies necessary for platform functionality. We do not use advertising cookies or share browsing data with third-party advertisers. Basic analytics may be used to understand platform usage patterns using anonymised data only.

## 10. Children's Privacy

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CLAVIS does not knowingly collect personal data from individuals under the age of 18. Our platform is intended for use by healthcare providers, employers, and adult patients only.

## 11. Changes to This Policy

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We may update this Privacy Policy from time to time. Material changes will be communicated to registered users via email at least 14 days before taking effect. Continued use of the platform after such notice constitutes acceptance of the updated policy.

## 12. Contact Us

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For any questions, requests, or complaints regarding your personal data or this Privacy Policy, please contact our Data Protection Officer:

- Email: [hello@clavishealth.ng](mailto:hello@clavishealth.ng)
- Address: CLAVIS Health Technologies Limited, Lekki Phase 1, Lagos State, Nigeria
- Phone: +234 904 275 2015

We will respond to all data subject requests within 30 days of receipt.