Data Deletion Policy

AsedaHost respects your fundamental right to privacy and personal data autonomy. This policy explains how you can request deletion of your personal data, what data can be erased, what information we are legally mandated to retain, and our step-by-step verification process.

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1. Introduction

This Data Deletion Policy outlines the procedures and standards by which **AsedaHost**, operated by **Erudite Africa Network** ("AsedaHost", "we", "us", or "our"), processes requests for the erasure, removal, and anonymization of personal data collected through our web portal (**asedahost.com**), USSD gateways, mobile interfaces, and associated voting and ticketing services.

This policy is formulated in accordance with the **Ghana Data Protection Act, 2012 (Act 843)**, international data privacy frameworks (including GDPR principles where applicable), and third-party platform specifications (including Meta Developer Platform and Google OAuth requirements). We are firmly dedicated to ensuring our users retain meaningful control over their personal information while upholding statutory financial and auditing obligations.

2. Who Can Request Data Deletion

Any individual whose personal data is processed by AsedaHost may initiate a data deletion request, including:

- **Registered Users:** Any individual holding an attendee, voter, host, or affiliate account on AsedaHost wishing to close their profile and erase associated personal identifiers.
- **Unregistered Guests & Voters:** Any individual who purchased an event ticket or cast a vote as an unregistered guest using their phone number, email address, or mobile money wallet.
- **Nominees & Contestants:** Any individual whose identity, photograph, biography, or stage name was uploaded to an event or award category by a third-party Event Host.
- **Authorized Representatives:** A parent, legal guardian, or court-appointed representative acting on behalf of a minor, incapacitated individual, or deceased user.

3. What Data Can Be Deleted

Upon receipt and successful verification of a valid deletion request, AsedaHost will permanently erase or irreversibly anonymize the following categories of personal information from our active databases and application environments:

- **Account Profile Information:** Full name, registered email address, mobile phone number, avatar/profile image, hashed password credentials, and social login mappings (Google OAuth identifiers).
- **Session & Authentication Records:** Stored session identifiers, active login tokens, and account access logs.
- **Uploaded Media & Bio Data:** Event banners, contestant photos, promotional audio/video links, and stage biographies submitted by or on behalf of the individual.
- **Communication & Support Logs:** Customer support tickets, feedback form submissions, chat histories, and marketing SMS/email notification preferences.

- **Non-Financial Event Participation:** RSVP lists, waitlist queue records, and voluntary survey responses no longer required for active event logistics.

> **Definition of Deletion:** Deletion means that your personal identifiers are either completely and permanently removed from our active databases, or permanently anonymized so the remaining records can never be associated with you.

4. Data We Are Required to Retain

Under prevailing statutory regulations in the Republic of Ghana, certain records **cannot be immediately deleted** upon request. AsedaHost operates a regulated digital financial flow via licensed Payment Service Providers (Hubtel). As such, we are legally mandated to retain the following records:

- **Financial & Transaction Records:** All payment transaction references, mobile money/card audit trails, Hubtel reference IDs, ticket order numbers, vote quantity totals, host wallet payout histories, and tax invoices must be retained for a mandatory statutory period of **five (5) to six (6) years** in compliance with the *Payment Systems and Services Act, 2019 (Act 987)*, the *Anti-Money Laundering Act, 2020 (Act 1044)*, and Ghana Revenue Authority (GRA) tax auditing regulations.
- **Award & Voting Result Integrity:** Cast vote counters and aggregate tallies embedded in published award show results cannot be deleted, as doing so would corrupt the verified historical integrity of competition outcomes. However, personal voter phone numbers linked to those votes will be stripped and dissociated from the public tally.
- **Fraud, Security & Abuse Records:** Digital forensic logs, blacklisted mobile numbers, and audit entries associated with confirmed automated bot voting, payment fraud, ticket cloning, or security breaches will be preserved for up to five (5) years under the *Cybersecurity Act, 2020 (Act 1038)* to protect the platform and cooperate with law enforcement agencies.
- **Active Legal Disputes:** Information relevant to ongoing litigation, chargeback disputes, consumer protection claims, or formal regulatory inquiries will remain preserved until the matter is fully resolved and discharged.
- **Sealed Identity Record:** When an account is anonymised, the identifying details removed from it are retained separately in an encrypted, sealed record for six (6) years. This record is not used by our platform, is not accessible to our staff in the ordinary course of their work, and cannot be used to contact you or to re-create your account. It exists solely so that we can identify the party to a transaction if we are lawfully compelled to — by a court order, a criminal investigation, or a regulator acting under the *Anti-Money Laundering Act, 2020 (Act 1044)* or the *Cybersecurity Act, 2020 (Act 1038)*. Every access to it is logged. Where a matter is under investigation, the record is held until that matter concludes.

5. How to Submit a Deletion Request

To guarantee security and prevent malicious or unauthorized account deletions, all requests must be submitted through our verified communication channels:

- **Email Submission:** Send an email from your registered account email address to privacy@asedahost.com or contact@asedahost.com with the subject line `"Data Deletion Request - [Your Full Name]"`.
- **WhatsApp Official Support:** Send a formal deletion request via our verified business WhatsApp lines: **+233 55 163 5653** or **+233 24 169 4276**.
- **In-App Account Settings:** Log in to your AsedaHost profile, navigate to *Settings › Privacy*, and select *"Request Account Erasure"*.

Please provide: (1) your full registered name, (2) your registered phone number, (3) registered email address, and (4) specific details of whether you are requesting complete account erasure or removal of specific nominee media.

6. How We Process Your Request (SLA)

We adhere to a transparent, auditable schedule to handle all data deletion requests:

- **Stage 1 (Within 48 Hours):** We acknowledge receipt of your deletion request and open a formal compliance ticket.
- **Stage 2 (Within 3 Business Days):** We confirm that the request genuinely comes from the account holder before acting on it. Depending on how the request reaches us, this may mean replying from the registered email address, confirming from the registered phone number, or answering questions about recent account activity. For third-party nominee removal, confirmation via the nominee's verified phone or official social channel may be requested.
- **Stage 3 (Within 7 Business Days):** Our team works out exactly which of your details can be deleted and which we have to keep by law, then schedules the deletion.
- **Stage 4 (After the 30-day recovery window):** Your account is closed immediately once verified, then held for thirty (30) days in case you wish to reverse the request. After that window closes, all eligible personal identifiers are permanently removed from our databases, file storage, and cached sessions. See section 7 for a full description of this process.
- **Final Confirmation:** A written Data Erasure Certificate or email confirmation is dispatched to you confirming the operation is complete.

7. What Happens After You Request Deletion

Deleting your account happens in two stages, with a thirty (30) day window in between during which you can change your mind:

- **Stage One — Closure (immediate):** As soon as your request is verified, your account is closed. You are signed out and can no longer log in, your events and listings are withdrawn from public view, and we stop sending you messages. Nothing has been erased at this point.
- **Thirty-Day Recovery Window:** For thirty (30) days after closure, your account can be fully restored if you contact us and confirm your identity. This protects you against accidental or malicious deletion. If you do nothing, the window simply lapses.
- **Stage Two — Anonymisation (after 30 days):** Once the window closes, we permanently remove the details that identify you — your name, email address, phone number, profile photo, biography, and login credentials. This step cannot be undone, and your account cannot be restored afterwards.

Why records remain after anonymisation: We do not delete the underlying payment, ticket, and vote records outright, because Ghanaian financial and tax law requires us to keep them for several years (see section 4). Instead, we sever the link between those records and you. What remains is a transaction history that can no longer be traced back to any identifiable person in the ordinary operation of our platform — which is what "deletion" means under this policy, as defined in section 3. The one exception is a sealed, encrypted identity record described in section 4, which can be opened only under legal compulsion, such as a court order or a criminal investigation.

A note for Hosts: If you have sold tickets or collected votes for an event that has not yet taken place, or you hold an unpaid wallet balance, we will contact you before closing your account. Attendees who have paid you must be refunded, and outstanding balances settled, before deletion can complete. We will tell you what is outstanding rather than deleting your account and leaving your attendees stranded.

8. Nominee & Third-Party Uploaded Data

If an Event Organizer has uploaded your name, likeness, or biography as an award nominee or performance guest without your consent, you have the right to have it taken down, and you do not need the organizer's agreement. Our Nominee & Contestant Policy sets out this right in full, including appeals and nominees under 18. In summary:

- Upon receiving your verified request, we will unpublish your image and name from the public voting portal within **24 to 48 hours**.
- We will formally notify the Event Host of the retraction.
- Existing votes accrued before delisting will remain permanently archived in the contest audit log for financial reconciliation with the Event Host.

9. Sub-Processors & Infrastructure Partners

AsedaHost uses reputable infrastructure and payment partners to deliver secure services:

- **Payment Aggregators (Hubtel Ghana):** Financial transaction data held on Hubtel's systems is governed by Hubtel's regulatory obligations under the Bank of Ghana. We propagate your deletion request to Hubtel where technically and legally permissible.
- **Telecom & SMS Gateways:** Transactional SMS transmission logs maintained by cellular providers (MTN, Telecel, AT) are purged in compliance with National Communications Authority (NCA) regulations.

10. Policy Updates & Modifications

AsedaHost reserves the right to amend this Data Deletion Policy periodically to reflect technological advancements, changes in data privacy legislation, or revisions to our service architecture. Any material updates will be publicized on our website and highlighted with an updated effective date.

11. Contact Our Privacy & Compliance Team

For any inquiries, requests for data access, or questions concerning our personal data handling practices, please contact our designated Data Protection Officer:

Data Protection & Privacy Desk — AsedaHost

Official Privacy & Compliance Inquiries

Email: privacy@asedahost.com or legal@asedahost.com
Telephone: +233 55 163 5653 / +233 53 538 5541
WhatsApp: +233 24 169 4276
Jurisdiction: Accra & Kumasi, Republic of Ghana