

Lumonie Privacy Policy

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In short

Lumonie is an expense-tracking app made by **Xandee Tech Ltd**. You can log expenses yourself, or connect your bank account through our partner **Zeeh Africa** so we can pull in your transactions automatically. We use this data to show you insights about your spending, including AI-generated insights. We don't sell your data. You can access or delete your data at any time by emailing us. Data is stored with our hosting provider, Supabase, outside Nigeria. Details below.

1. Who we are

Xandee Tech Ltd ("Xandee Tech," "we," "us," "our") is the company behind Lumonie (lumonie.app), and is responsible for your personal data as described in this policy.

- **Address:** Calabar, Cross River State, Nigeria
- **Privacy contact:** privacy@xandee.tech

If you have any question about this policy or your data, that email is the fastest way to reach us.

2. What data we collect

Category	Examples	How we collect it	Why
Account/identity data	Name, email address	Directly from you, when you sign up	Create and manage your account
Manually logged expenses	Amount, category, date, notes you enter	Directly from you	Let you track spending and see insights
Bank transaction data	Bank name, account details, transaction history	Automatically, from your bank, via our partner Zeeh Africa , only after you authorize the connection	Let you track spending automatically without manual entry
Payment data (for paid features, if any)	Card/payment details	Directly from you, but handled by our payment processor Korapay — we don't receive or store your full card number	Process payments for the app
Device/usage data	App usage, device type, crash logs	Automatically, as you use the app	Keep the app working, fix bugs

We don't collect any other categories of data beyond what's listed here — no biometric data, no government ID, and no precise location tracking from our side.

A note on Zeeh Africa: when you connect your bank account, Zeeh Africa may need to verify your identity as part of its own onboarding process (this is separate from Lumonie). That verification is governed by Zeeh Africa's own privacy policy, which we encourage you to read before connecting your account.

3. Why we use your data

Purpose	Data used	Basis	Retention
Provide the app and your account	Identity data	Necessary to provide the service you signed up for	While your account is active
Track and display your expenses	Manually logged + bank transaction data	Necessary to provide the service	While your account is active
Generate spending insights (including AI-based insights)	Expense and transaction data	Necessary to provide the service you asked for	While your account is active
Process payments	Payment data (via Korapay)	Necessary to fulfil your payment	Per Korapay's own retention practices
Send you marketing emails and push notifications	Email address, device notification token	Your consent — you can opt out any time	Until you unsubscribe
Keep the app secure and working	Device/usage data	Our legitimate interest in running a working, secure product	While your account is active

4. Cookies and tracking

The Lumonie mobile app does not use browser cookies. If our website (lumonie.app) uses any analytics or advertising cookies, this section will be updated to disclose them individually before they're used.

[GAP — confirm before publishing: does lumonie.app use any analytics, ad, or tracking cookies (e.g. Google Analytics, Meta Pixel)? If yes, they need to be named here and a cookie-consent banner added.]

5. Who we share your data with

We share data with the following service providers, only as needed to run Lumonie:

- **Zeeh Africa** — our open banking partner, which retrieves your bank transaction data on your authorization.
- **Korapay** — our payment processor, which handles payment/card data for any paid features.
- **Resend** — our email delivery provider, used to send transactional and marketing emails.

- **Supabase** — our hosting and database provider, which stores your account and expense data.

We don't sell your personal data, and we don't share it with advertisers.

6. International data transfers

Your data is stored with Supabase, outside Nigeria. Because this means your data may leave the country you're in, we take steps to keep it protected in line with Supabase's own security and data-protection commitments as our processor.

[GAP — confirm before publishing: which country/region does Supabase host your data in? Naming it (and Supabase's transfer safeguard, e.g. its own SCCs/DPA) makes this section fully accurate.]

7. How long we keep your data

We keep your data for as long as your account is active. If you delete your account, we keep your data for **30 days** after deletion, then permanently delete or anonymize it. This 30-day window lets us reverse accidental deletions if you ask us to.

8. Your rights and how to exercise them

Wherever you're based, you generally have the right to:

- **Access** the personal data we hold about you
- **Correct** inaccurate data
- **Delete** your data
- **Object to or restrict** certain uses of your data
- **Withdraw consent** for anything we process based on your consent (e.g. marketing, or your bank connection via Zeeh Africa) — this doesn't undo processing we already did before you withdrew

To exercise any of these rights, email [**privacy@xandee.tech**](mailto:privacy@xandee.tech). We may ask you to verify your identity first, and we'll respond within a reasonable time.

You can unsubscribe from marketing emails using the link in any marketing email, and you can turn off push notifications from your device's notification settings.

9. AI-generated insights

Lumonie uses AI/algorithmic processing on your expense and transaction data to generate spending insights (for example, spotting patterns or trends in how you spend). These insights are informational only — Lumonie doesn't use AI to make any automatic decision that has a legal or similarly significant effect on you (for example, we don't use it to approve or deny you anything).

We do not use your data to train AI models — yours or any third-party provider's.

[GAP — confirm before publishing: which AI provider/model powers the insights feature (your own model, or a third-party API like OpenAI/Anthropic/Google)? It should be named here as a sub-processor, along with that provider's own data-training posture.]

10. Children

Lumonie is not directed at children, and we don't knowingly collect personal data from children under 13. If you believe a child has given us data, contact us at privacy@xandee.tech and we'll delete it.

11. Security

We use reasonable administrative, technical, and organizational measures to protect your data. No method of storage or transmission is 100% secure, so we can't guarantee absolute security — but we work to protect your information and to respond quickly if something goes wrong.

12. Changes to this policy

We'll update the "last updated" date at the top of this page whenever we make changes. If a change is material — for example, if we start sharing data with a new type of recipient, or start using your data in a new way — we'll notify you directly, such as by email, before the change takes effect, not just by posting a new version.

13. Contact us

For any question, request, or concern about your data or this policy: privacy@xandee.tech

Xandee Tech Ltd Calabar, Cross River State, Nigeria

14. A note on which laws apply

Xandee Tech is based in Nigeria, and Lumonie's users are across Africa. Nigeria's data protection law, the **Nigeria Data Protection Act (NDPA)**, applies to how we handle your data, and the rights in Section 8 are written to match what the NDPA generally requires. If you're in another African country, additional local data protection laws may also apply to you.

[GAP — confirm before publishing: which specific countries, beyond Nigeria, do you have meaningful numbers of users in? Each may have its own data protection law (e.g. South Africa's POPIA, Kenya's Data Protection Act, Ghana's Data Protection Act) that could require additional disclosures.]

15. Disclaimer

This document is an informational template, not legal advice, and using it does not create an attorney-client relationship. Because Lumonie connects directly to users' bank accounts

through Zeeh Africa, this involves financial data handling that goes meaningfully beyond a standard payment processor — **we strongly recommend having this policy reviewed by a Nigerian lawyer or privacy counsel familiar with the NDPA and open banking/CBN-related rules before publishing it**, and before finalizing your data processing agreement with Zeeh Africa.