CARGOAL

PRIVACY POLICY

How CarGoal collects, uses, and protects your personal information

Effective Date: January 2026

1. INTRODUCTION

CarGoal ("we", "us", "our") is committed to protecting the privacy and security of your personal information. This Privacy Policy explains how we collect, use, share, and protect personal data when you use the CarGoal platform.

This Policy is compliant with Ghana's Data Protection Act, 2012 (Act 843) and the Electronic Transactions Act, 2008 (Act 772). By using CarGoal, you consent to the collection and use of your information as described in this Policy.

2. DATA CONTROLLER

The data controller responsible for your personal information is:

- CarGoal
- Co-founders: Richmond Akesseh and Desmond Osei Duodu
- Address: Tema, Greater Accra Region, Republic of Ghana
- WhatsApp: +233 555 389 551
- Email: privacy@cargoal.com.gh

CarGoal is registered as a data controller with the Data Protection Commission of Ghana as required under Act 843.

3. INFORMATION WE COLLECT

3.1 Information You Provide

- Full name and business name
- Phone number (used for WhatsApp communication and account identification)
- National ID details (for Driver verification)
- Driver's license details (for Driver verification)
- Email (used for WhatsApp communication and account identification)
- Vehicle registration details (for Driver verification)
- Mobile money account details (for payment processing)
- Cargo details submitted at booking (type, weight, destination)
- Communications sent via WhatsApp or the Platform

3.2 Information We Collect Automatically

- GPS and location data (collected during active cargo transit with your consent)
- Device information and operating system (when using the mobile app)
- App usage data and interaction logs
- IP address and browser type (when accessing the website)

3.3 Information From Third Parties

- Payment confirmation data from Paystack, MTN MoMo, Telecel Cash, and AirtelTigo
- Insurance verification data from Enterprise Insurance Ghana
- Identity verification results from manual document checks

4. HOW WE USE YOUR INFORMATION

We use your personal information for the following purposes:

- To create and manage your CarGoal account
- To process cargo bookings and match you with suitable Drivers or Importers
- To process payments and manage escrow transactions
- To provide real-time GPS tracking of cargo during transit
- To facilitate optional cargo insurance through Enterprise Insurance Ghana
- To verify Driver identity, license, and vehicle documents
- To communicate booking updates, notifications, and service information
- To investigate and resolve disputes between users
- To improve the Platform and develop new features
- To comply with legal and regulatory obligations
- To detect and prevent fraud, abuse, and unlawful activity

5. LEGAL BASIS FOR PROCESSING

Under Ghana's Data Protection Act, 2012 (Act 843), we process your personal data on the following legal bases:

- Consent: Where you have given explicit consent, such as for GPS location tracking during transit.
- Contract: Processing necessary to fulfil our obligations under the CarGoal Terms of Service.
- Legal Obligation: Processing required to comply with Ghanaian law, including anti-money laundering regulations and tax obligations.
- Legitimate Interests: Processing for fraud prevention, platform security, and service improvement, where these interests do not override your fundamental rights.

6. SHARING YOUR INFORMATION

CarGoal shares your information only in the following circumstances:

With Drivers and Importers: Necessary booking details are shared between matched parties (e.g., Importer's cargo location is shared with the assigned Driver; Driver's name and vehicle details are shared with the Importer).

With Enterprise Insurance Ghana: If you opt for cargo insurance, your booking details and cargo value are shared with Enterprise Insurance Ghana for the purpose of underwriting your insurance.

With Payment Processors: Payment data is processed by Paystack and the relevant mobile money networks (MTN MoMo, Telecel Cash, AirtelTigo) to facilitate transactions.

With Technology Providers: Technical service providers including cloud hosting, mapping, and SMS services process data on our behalf as data processors.

With Regulators and Law Enforcement: Where required by Ghanaian law, court order, or to protect the rights and safety of CarGoal users.

CarGoal does not sell your personal data to third parties. CarGoal does not share your data with advertisers.

7. GPS LOCATION DATA

CarGoal collects real-time GPS location data from Drivers during active cargo transport only. Location tracking begins when a Driver accepts a job and ends when delivery is confirmed. Location data is:

- Used to provide live cargo tracking to the Importer whose goods are in transit
- Stored for a maximum of ninety (90) days for dispute resolution purposes
- Never used for advertising or sold to third parties

Drivers are informed at account setup that GPS tracking is required during active jobs as a condition of using the Driver service.

8. DATA RETENTION

We retain your personal information for the following periods:

- Account information: For the duration of your account plus three (3) years after closure
- Booking records and transaction data: Seven (7) years (for tax and accounting compliance under Ghanaian law)
- GPS tracking data: Ninety (90) days
- Communications (WhatsApp): Twelve (12) months
- Driver verification documents: For the duration of Driver registration plus two (2) years

After retention periods expire, data is securely deleted or anonymised.

9. YOUR RIGHTS UNDER GHANA DATA PROTECTION ACT 2012

Under Act 843, you have the following rights regarding your personal data:

- Right of access: Request a copy of the personal data we hold about you.
- Right to correction: Request correction of inaccurate or incomplete data.
- Right to erasure: Request deletion of your data where there is no lawful basis for retention.
- Right to object: Object to processing of your data for specific purposes.
- Right to complain: Lodge a complaint with the Data Protection Commission of Ghana.

To exercise any of these rights, contact us at privacy@cargoal.com.gh or WhatsApp +233 555 389 551. We will respond within twenty-one (21) days as required by Act 843.

10. DATA SECURITY

CarGoal implements appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, destruction, or alteration. These measures include:

- Encrypted data transmission using HTTPS and TLS protocols
- Encrypted storage of sensitive personal data
- Access controls limiting data access to authorised personnel only
- Regular security assessments of our Platform
- Secure payment processing through PCI-DSS compliant providers

No security system is impenetrable. In the event of a data breach that is likely to result in risk to your rights, we will notify you and the Data Protection Commission of Ghana within seventy-two (72) hours of becoming aware of the breach.

11. COOKIES AND TRACKING

Our website (www.cargoal.com.gh) uses minimal cookies necessary for the website to function correctly. We do not use advertising cookies or track users across third-party websites. You may disable cookies through your browser settings, though this may affect website functionality.

12. CHILDREN'S PRIVACY

CarGoal's Platform is not directed at children under the age of 18. We do not knowingly collect personal data from children. If you believe a child has provided us with personal information, contact us at privacy@cargoal.com.gh and we will delete it promptly.

13. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. Changes will be posted on www.cargoal.com.gh and communicated to registered users via WhatsApp or the mobile application. The effective date at the top of this Policy indicates when it was last revised.

14. CONTACT AND COMPLAINTS

For privacy questions or to exercise your rights:

- WhatsApp: +233 555 389 551

- Email: privacy@cargoal.com.gh

To lodge a formal complaint:

- Data Protection Commission of Ghana
- Website: www.dataprotection.org.gh

⚠ LEGAL NOTICE: This Privacy Policy should be reviewed by a qualified Ghanaian lawyer with expertise in data protection law before publishing.