

# PRIVACY POLICY

*Effective Date: July 15, 2025 | Last Updated: July 15, 2025 | Version 1.0*

**YOUR PRIVACY MATTERS.** At GWAY FOODS, we are firmly committed to protecting your personal information and your right to privacy. This Privacy Policy explains in detail how we collect, use, store, share, and protect your personal data when you visit our website **gwayfoods.com**, create an account, or purchase our products. This policy is designed to comply with the **Data Protection Act, 2012 (Act 843)** of the Republic of Ghana and other applicable data protection laws and regulations.

## TABLE OF CONTENTS

1. Data Controller Information
2. Scope of This Policy
3. Information We Collect
4. How We Collect Your Information
5. Legal Basis for Processing
6. How We Use Your Information
7. Information Sharing & Disclosure
8. Cookies & Tracking Technologies
9. Data Retention
10. Data Security Measures
11. Your Data Protection Rights
12. Children's Privacy
13. Third-Party Links & Services
14. International Data Transfers
15. Admin Account Data Processing
16. Data Breach Notification
17. Changes to This Privacy Policy
18. Complaints & Regulatory Authority
19. Contact Us

# 1. DATA CONTROLLER INFORMATION

---

GWAY FOODS is the data controller responsible for the collection and processing of your personal information through this Website. As data controller, we determine the purposes and means of processing your personal data in compliance with the Data Protection Act, 2012 (Act 843) of Ghana.

Detail	Information
<b>Data Controller</b>	GWAY FOODS
<b>Website</b>	gwayfoods.com
<b>Business Type</b>	Food Manufacturing & E-Commerce (Tomato Paste, Juices & Beverages)
<b>Country</b>	Republic of Ghana
<b>Email</b>	gwayfoods@gmail.com
<b>Phone</b>	+233 53 888 2888 / +233 20 095 5768
<b>Location</b>	Accra, Ghana

# PRIVACY POLICY

gwayfoods.com | Effective: July 15, 2025

**GWAY FOODS**

---

## 2. SCOPE OF THIS POLICY

---

This Privacy Policy applies to all personal data collected through:

- Our Website at gwayfoods.com, including all pages, features, and digital services
- User account registration and login processes (customer accounts)
- Admin login and administrative dashboard functions
- Product browsing, ordering, and transaction processes
- Customer support interactions via email, phone, or online forms
- Newsletter subscriptions and marketing communications
- Any surveys, feedback forms, or review submissions on the Website

This Privacy Policy does not apply to information collected by third-party websites, applications, platforms, or services that may be linked from or integrated with our Website.

## 3. INFORMATION WE COLLECT

---

### 3.1 Personal Information You Provide Directly

When you create an account, place an order, contact us, or interact with our Website, we may collect the following categories of personal information:

Category	Specific Data Points	Collection Context
<b>Identity Data</b>	Full name, username, title	Registration, ordering
<b>Contact Data</b>	Email address, phone number(s), delivery address, billing address, city/region	Registration, checkout, delivery
<b>Account Data</b>	Username, encrypted password, account preferences, profile settings	Registration, login, settings
<b>Transaction Data</b>	Order numbers, order history, items purchased, quantities, order status, purchase amounts	Ordering, checkout
<b>Financial Data</b>	Mobile money number, payment method type, partial card details	Checkout, payment
<b>Communication Data</b>	Customer service messages, support tickets, feedback, complaints, product reviews	Contact forms, email, phone
<b>Marketing Data</b>	Newsletter subscription status, marketing consent records, communication preferences	Newsletter signup, settings

### 3.2 Information Collected Automatically

When you visit or interact with our Website, we automatically collect certain technical and usage information:

Category	Specific Data Points
<b>Device Data</b>	Device type, operating system, browser type and version, screen resolution, device identifiers
<b>Usage Data</b>	Pages visited, time spent on each page, products viewed, click patterns, navigation paths, search queries
<b>Location Data</b>	Approximate geographic location derived from IP address, delivery location coordinates
<b>Log Data</b>	IP address, access date and time, server logs, HTTP request headers, error logs

# PRIVACY POLICY

gwayfoods.com | Effective: July 15, 2025

**GWAY FOODS**

## 4. HOW WE COLLECT YOUR INFORMATION

We collect personal data through the following methods:

- **Direct Interactions:** When you fill in forms, create an account, place an order, subscribe to our newsletter, contact customer support, provide feedback, participate in promotions, or otherwise communicate with us directly.
- **Automated Technologies:** As you navigate and interact with our Website, certain technical data is automatically collected through cookies, server logs, web beacons, and similar tracking technologies.
- **Third-Party Sources:** We may receive limited information from payment processors (transaction confirmations, fraud alerts), delivery partners (delivery confirmations), and analytics services (aggregated usage statistics).

## 5. LEGAL BASIS FOR PROCESSING YOUR DATA

Under the **Data Protection Act, 2012 (Act 843)** of Ghana, we process your personal data based on one or more of the following lawful grounds:

Legal Basis	Description	Examples of Processing
<b>Your Consent</b>	You have given clear, informed, and voluntary consent for processing your data for specific purposes.	Newsletter subscriptions, marketing emails, promotional SMS, non-essential cookies
<b>Contractual Necessity</b>	Processing is necessary to perform or prepare a contract with you.	Processing orders, managing accounts, delivering products, processing payments and refunds
<b>Legal Obligation</b>	Processing is necessary to comply with applicable laws and regulations.	Tax records, financial reporting, regulatory compliance, responding to court orders
<b>Legitimate Interests</b>	Processing is necessary for our legitimate business interests, balanced against your rights.	Website security, fraud prevention, analytics, service improvement
<b>Vital Interests</b>	Processing is necessary to protect someone's life, health, or safety.	Product safety recalls, food contamination alerts, emergency notifications

## 6. HOW WE USE YOUR INFORMATION

---

### 6.1 Order Fulfillment & Service Delivery

- Processing, confirming, and managing your orders for GWAY FOODS products
- Arranging and coordinating product delivery to your specified address within Ghana
- Processing payments, issuing invoices and receipts, and handling refunds
- Sending order confirmations, shipping updates, delivery notifications, and delivery receipts
- Managing product returns, exchanges, and dispute resolution

### 6.2 Account Management

- Creating, maintaining, and managing your user account on gwayfoods.com
- Authenticating your identity during login to protect your account
- Providing access to your order history, saved addresses, and account settings
- Managing your communication and notification preferences

### 6.3 Customer Support

- Responding to your inquiries, questions, requests, and complaints
- Providing technical assistance and troubleshooting website issues
- Following up on customer feedback and resolving service issues

# PRIVACY POLICY

gwayfoods.com | Effective: July 15, 2025

**GWAY FOODS**

## 6.4 Marketing & Communications (Consent-Based)

- Sending promotional emails, newsletters, and special offers about GWAY FOODS products
- Notifying you about new product launches, seasonal promotions, and exclusive deals
- Personalizing marketing content based on your purchase history and browsing preferences

**YOUR RIGHT TO OPT OUT:** You may unsubscribe from marketing communications at any time by: (a) clicking the "Unsubscribe" link in any marketing email; (b) updating your communication preferences in your account settings; or (c) contacting us at [gwayfoods@gmail.com](mailto:gwayfoods@gmail.com) with the subject "Unsubscribe." Opting out of marketing will not affect essential transactional communications related to your orders and account.

## 6.5 Website Improvement & Analytics

- Analyzing website traffic patterns, user behavior, and engagement metrics
- Improving website design, navigation, functionality, and overall user experience
- Testing new features, product pages, and service offerings
- Understanding customer preferences, purchasing trends, and market demand

## 6.6 Security & Fraud Prevention

- Detecting, preventing, and investigating fraudulent transactions, payment fraud, and unauthorized access
- Protecting the security, integrity, and availability of our Website, systems, and data
- Monitoring accounts for suspicious or anomalous activity
- Maintaining audit logs for security and compliance purposes

## 7. INFORMATION SHARING & DISCLOSURE

**WE DO NOT SELL YOUR DATA.** GWAY FOODS does not sell, rent, lease, or trade your personal information to third parties for their own marketing or commercial purposes. Period.

### 7.1 Service Providers & Business Partners

We share your information with carefully selected, trusted third-party service providers who assist us in operating our business and serving you:

Service Provider Category	Purpose of Sharing	Data Shared
<b>Payment Processors</b>	Secure payment processing (Mobile Money, card payments)	Transaction amount, payment method, billing info
<b>Delivery &amp; Logistics</b>	Product delivery to your address	Name, phone, delivery address, order details
<b>Web Hosting / Cloud</b>	Website hosting and data storage	All website data (encrypted)
<b>Email Services</b>	Transactional and marketing emails	Email address, name, order info
<b>Analytics</b>	Website usage analysis	Anonymized/aggregated usage data

## 7.2 Legal & Regulatory Disclosure

We may disclose your personal data if required or permitted by law, including to comply with legal obligations, court orders, subpoenas, or government requests; to protect the rights, property, or safety of GWAY FOODS, our users, or the public; to investigate or prevent suspected fraud, security threats, or illegal activity; and to enforce our Terms and Conditions.

## 7.3 Business Transfers

In the event of a merger, acquisition, sale of assets, corporate reorganization, or bankruptcy, your personal data may be transferred to the acquiring entity. We will provide advance notice before your information becomes subject to a different privacy policy.

# PRIVACY POLICY

gwayfoods.com | Effective: July 15, 2025

**GWAY FOODS**

## 8. COOKIES & TRACKING TECHNOLOGIES

### 8.1 About Cookies

Cookies are small text files stored on your device when you visit our Website. They enable essential functionality, remember your preferences, and help us understand how our Website is used to improve your experience.

### 8.2 Types of Cookies We Use

Cookie Type	Purpose	Duration	Required?
<b>Essential / Strictly Necessary</b>	Core website functionality: user login sessions, shopping cart, checkout process, security features	Session – 1 year	Yes
<b>Functional / Preference</b>	Remember your preferences, language, region, and personalization settings	Up to 1 year	No
<b>Analytics / Statistics</b>	Collect anonymous data on how visitors use the Website via tools like Google Analytics	Up to 2 years	No
<b>Performance</b>	Monitor page load times, server response, and error rates for optimization	Session – 1 year	No
<b>Marketing / Advertising</b>	Track browsing behavior for targeted advertising and measuring ad campaign effectiveness	Up to 2 years	No

### 8.3 Managing Your Cookie Preferences

You have control over cookies in several ways:

- **Browser Settings:** Configure your web browser to accept all cookies, reject all cookies, or notify you when a cookie is being set.
- **Cookie Consent Banner:** Upon first visiting our Website, you may be presented with a cookie consent mechanism allowing you to accept or decline non-essential cookies.
- **Google Analytics Opt-Out:** Install the Google Analytics Opt-out Browser Add-on from [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

## 9. DATA RETENTION

We retain your personal data only for as long as reasonably necessary to fulfill the purposes for which it

was collected, to comply with our legal and regulatory obligations, to resolve disputes, and to enforce our agreements.

<b>Data Category</b>	<b>Retention Period</b>	<b>Justification</b>
Account Information	Duration of active account + 2 years post-deletion	Account management, legal compliance
Order & Transaction Records	6 years from transaction date	Tax compliance, financial regulations, dispute resolution
Payment Records	6 years from transaction date	Financial regulations, audit requirements
Customer Support Records	3 years from last interaction	Quality assurance, dispute resolution
Marketing Consent Records	Duration of consent + 2 years post-withdrawal	Proof of consent, regulatory compliance
Analytics / Usage Data	Up to 26 months	Website improvement, trend analysis
Server & Security Logs	12 months	Security monitoring, incident investigation

Upon expiration of the applicable retention period, personal data will be securely deleted, anonymized, or destroyed using industry-standard methods.

## 10. DATA SECURITY MEASURES

GWAY FOODS takes the protection of your personal data very seriously. We implement comprehensive technical and organizational security measures designed to protect your information against unauthorized access, alteration, disclosure, loss, or destruction.

### **Our Security Measures Include:**

- **SSL/TLS Encryption:** All data transmitted between your browser and our website servers is encrypted using industry-standard SSL/TLS protocols (HTTPS).
- **Password Hashing:** User passwords are stored using strong, one-way cryptographic hashing algorithms. Passwords are never stored in plain text.
- **Role-Based Access Controls (RBAC):** Strict access controls ensure that admin users and staff can only access the specific data and systems necessary for their authorized roles.
- **Secure Payment Processing:** Payment transactions are handled by PCI DSS-compliant third-party payment processors. Sensitive financial data is never stored on GWAY FOODS servers.
- **Firewall & Network Security:** Enterprise-grade firewalls, intrusion detection systems (IDS), and continuous network monitoring protect against unauthorized access.
- **Regular Security Updates:** Timely application of software patches, security updates, and vulnerability assessments to maintain system integrity.
- **Employee Data Protection Training:** All GWAY FOODS personnel with access to personal data receive training on data protection principles and security best practices.
- **Data Backup & Recovery:** Regular automated backups with secure off-site storage and tested disaster recovery procedures.
- **Audit Logging:** Comprehensive logging of system access, admin actions, and data processing activities for security monitoring and compliance auditing.

**IMPORTANT DISCLAIMER:** While GWAY FOODS implements robust security measures, no method of electronic transmission over the Internet or method of electronic data storage is 100% secure. You are responsible for safeguarding your account credentials. Please contact us immediately at [gwayfoods@gmail.com](mailto:gwayfoods@gmail.com) or +233 53 888 2888 if you suspect unauthorized access to your account.

## 11. YOUR DATA PROTECTION RIGHTS

Under the **Data Protection Act, 2012 (Act 843)** of Ghana, you are entitled to the following rights concerning your personal data:

Your Right	Description
<b>Right of Access</b>	Request a copy of the personal data we hold about you, along with information on how it is processed, for what purposes, and with whom it is shared.
<b>Right to Rectification</b>	Request correction or update of any inaccurate, incomplete, or outdated personal data we hold about you.
<b>Right to Erasure (Deletion)</b>	Request the deletion of your personal data where there is no compelling or legal reason for its continued processing.
<b>Right to Restrict Processing</b>	Request that we temporarily limit or suspend the processing of your personal data in certain circumstances.
<b>Right to Object</b>	Object to the processing of your personal data for direct marketing purposes or where processing is based on our legitimate interests.
<b>Right to Data Portability</b>	Request that your personal data be provided to you or transferred to another service provider in a structured, commonly used, machine-readable format.
<b>Right to Withdraw Consent</b>	Where processing is based on your consent, you may withdraw that consent at any time. Withdrawal does not affect the lawfulness of prior processing.
<b>Right Against Automated Decisions</b>	Not to be subject to decisions based solely on automated processing (including profiling) that significantly affect you, where applicable.

# PRIVACY POLICY

gwayfoods.com | Effective: July 15, 2025

**GWAY FOODS**

---

## How to Exercise Your Rights

To exercise any of the above rights, please submit a request to us using the following contact details:

- **Email:** gwayfoods@gmail.com
- **Subject Line:** "Data Protection Request – [Specify Your Right]"
- **Phone:** +233 53 888 2888 / +233 20 095 5768

We will acknowledge receipt of your request within **five (5) business days** and provide a substantive response within **thirty (30) days**. We may need to verify your identity before processing your request.

## 12. CHILDREN'S PRIVACY

---

Our Website, products, and services are not directed to, designed for, or intended for use by individuals under the age of **eighteen (18) years**. GWAY FOODS does not knowingly collect, solicit, or process personal information from children under 18.

If we become aware that personal data has been inadvertently collected from a child under 18 without verified parental or guardian consent, we will take prompt steps to securely delete such information from our systems. If you are a parent or legal guardian and believe your child has provided personal information to us, please contact us immediately at **gwayfoods@gmail.com**.

## 13. THIRD-PARTY LINKS & SERVICES

---

Our Website may contain hyperlinks, buttons, widgets, or integrations connecting to third-party websites, platforms, social media services, or applications, including but not limited to:

- Social media platforms (Facebook, Instagram, Twitter/X, WhatsApp, TikTok)
- Third-party payment processing gateways
- Maps and location services (e.g., Google Maps)
- Review and rating platforms
- Advertising networks

This Privacy Policy applies solely to information collected through gwayfoods.com. GWAY FOODS is not responsible for the privacy practices, data collection methods, content, or security of any third-party websites or services. We strongly advise you to review the privacy policies of all third-party services before sharing personal information.

## 14. INTERNATIONAL DATA TRANSFERS

---

GWAY FOODS primarily processes and stores personal data within the Republic of Ghana. However, certain third-party service providers we use may store or process data in servers located outside of Ghana.

Where personal data is transferred to jurisdictions outside Ghana, we ensure adequate protection through:

- Verifying that the receiving country provides an adequate level of data protection as recognized by the Data Protection Commission of Ghana
- Implementing appropriate safeguards such as standard contractual clauses (SCCs) and data processing agreements (DPAs) with service providers
- Ensuring transfers are necessary for the performance of our contract with you or are made with your informed consent
- Confirming that receiving entities maintain industry-standard security certifications and practices

By using our Website, you acknowledge and consent to the transfer of your data to jurisdictions outside Ghana where our service providers may operate, subject to the protective measures described above.

## 15. ADMIN ACCOUNT DATA PROCESSING

---

GWAY FOODS operates administrative accounts for authorized personnel to manage the Website and its operations.

### 15.1 Data Collected for Admin Accounts

- Full name, employee/role identification, and job function
- Professional email address and phone number
- Login credentials (stored in encrypted/hashed format)
- Detailed activity and audit logs (login timestamps, pages accessed, actions performed, IP addresses used)
- Role-based access permission levels and change history

### 15.2 Purpose of Admin Data Processing

Admin data is processed exclusively for: website management and administration, product catalog and inventory management, order processing and customer service, security monitoring and threat detection, access control and authorization management, internal compliance auditing, and performance evaluation of website operations.

### 15.3 Customer Data Access by Administrators

Authorized admin users may access customer personal data strictly as necessary for legitimate, defined business purposes. All admin access to customer data is comprehensively logged, regularly audited, and subject to GWAY FOODS' internal data protection and confidentiality policies.

## 16. DATA BREACH NOTIFICATION

---

In the event of a confirmed personal data breach, GWAY FOODS will undertake the following actions in accordance with the Data Protection Act, 2012 (Act 843):

1. **Regulatory Notification:** Notify the **Data Protection Commission of Ghana** within **seventy-two (72) hours** of becoming aware of the qualifying breach.
2. **Individual Notification:** Notify affected individuals without undue delay if the breach is likely to result in a **high risk** to their rights and freedoms.
3. **Breach Communication:** Provide clear information about the nature and circumstances of the breach, categories and number of individuals affected, types of personal data involved, likely consequences, and measures taken to address the breach.

4. **Documentation:** Maintain comprehensive records of all data breaches, including breaches that do not require external notification.

## 17. CHANGES TO THIS PRIVACY POLICY

---

GWAY FOODS reserves the right to update, amend, or replace this Privacy Policy at any time as our practices evolve, technology changes, or legal requirements are updated. When changes are made:

- The "Last Updated" date at the top of this document will be revised.
- The updated Privacy Policy will be posted prominently on our Website.
- For **material changes**, we will provide additional prominent notice on the Website homepage and/or send direct email notification to registered users at least **fourteen (14) days** before the changes take effect.

Your continued use of the Website after changes are posted constitutes acceptance of the revised policy. If you do not agree with any changes, please discontinue use of the Website and contact us to request account deletion.

# PRIVACY POLICY

gwayfoods.com | Effective: July 15, 2025

**GWAY FOODS**

## 18. COMPLAINTS & REGULATORY AUTHORITY

If you believe your data protection rights have been violated, or that GWAY FOODS has not handled your personal information in accordance with this Privacy Policy or applicable law, you have the right to seek resolution through the following channels:


### 18.1 Complain to GWAY FOODS (Recommended First Step)

We encourage you to contact us first so we can attempt to resolve your concern directly and promptly. Please email [gwayfoods@gmail.com](mailto:gwayfoods@gmail.com) with the subject line "Privacy Complaint" and include a detailed description of your concern. We will acknowledge your complaint within five (5) business days and aim to resolve it within thirty (30) business days.

### 18.2 Complain to the Data Protection Commission of Ghana

You have the statutory right to lodge a formal complaint with the national data protection supervisory authority:

#### Data Protection Commission of Ghana

 **Website:** [www.dataprotection.org.gh](http://www.dataprotection.org.gh)

 **Email:** [info@dataprotection.org.gh](mailto:info@dataprotection.org.gh)


 **Location:** Accra, Ghana


While we respect your right to complain to the supervisory authority at any time, we kindly request that you first allow us a reasonable opportunity to address and resolve your concern.


## 19. CONTACT US

For any questions, concerns, requests, or feedback regarding this Privacy Policy, the handling of your personal data, or to exercise your data protection rights, please contact us through any of the following channels:

#### GWAY FOODS — Privacy & Data Protection Inquiries


 **Website:** [www.gwayfoods.com](http://www.gwayfoods.com)

 **Email:** gwayfoods@gmail.com

 **Phone:** +233 53 888 2888

 **Alternate Phone:** +233 20 095 5768

 **Location:** Accra, Ghana

 **Business Hours:** Monday – Friday, 8:00 AM – 5:00 PM (GMT)

For data protection and privacy-related inquiries, please include "Privacy," "Data Protection," or "DSAR" in the subject line of your email for priority handling.

Thank you for trusting **GWAY FOODS** with your personal information.

We are committed to earning and maintaining that trust through transparent, responsible, and lawful data practices.