



# COBRANET LIMITED - PRIVACY POLICY

## 1. INTRODUCTION

Welcome to Cobranet Limited (“Cobranet”, “We”, “Our” or “Us”) Privacy Policy. We respect your privacy and are committed to protecting your Personal Data. This Privacy Policy will inform you as to how we collect, use, share and look after your Personal Data when you visit our Platform (regardless of where you visit it from) or use any of our services and tell you about your privacy rights and how the law protects you.

## 2. ABOUT THIS POLICY

Cobranet takes privacy seriously and we are committed to protecting it. This policy explains when and why we collect personal information about you, how this information is used, the conditions under which it may be disclosed to others and how it is kept secure. This is our main privacy policy. We may provide additional, specific privacy information to you as you interact with us in different ways (e.g. that we will only use certain information for specific purposes). To the extent that any specific statements differ from what we say below, they will apply in those circumstances. Our privacy policy may be updated from time to time so you may wish to check it each time you submit personal information to us. The date of the most recent revision will appear here.

## 3. WHO WE ARE AND RESPONSIBILITY FOR THIS POLICY

3.1. Cobranet is the controller in relation to the processing activities involving your Personal Data. This means we decide why and how your personal information is processed. Our registered office is Plot 24, Block 10, Jeremiah Ugwu Street, Lekki Phase 1, Lagos

3.2. If you have any questions about this Privacy Policy or our privacy practices, please contact our Data Protection Officer in the following ways:

**Name:** Patrick Minas

**Email address:** patrick.minas@cobranet.ng

**Office Address:** Plot 24, Block 10, Jeremiah Ugwu Street, Lekki Phase 1, Lagos

**Telephone number:** 08079292298

## 4. THE INFORMATION THAT WE COLLECT

We may collect personal data i.e., any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; It can be anything from a name, address, a photo, an email address, bank details, posts on social networking websites, medical information, and other unique identifier such as but not limited to MAC address, IP address, IMEI number, IMSI number, SIM, Personal Identifiable Information (PII) and others (‘Personal Data’).

## 5. HOW WE COLLECT, PROCESS, USE AND SHARE PERSONAL DATA

5.1. We may collect your Personal Data using forms, email and physical requests, cookies, JWT, web tokens, or third-party applications. You can set your browser to refuse all or some browser cookies, or to alert you if we access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly.

- 5.2. We use your Personal Data for, verification of your identity; human resources management; access to computer systems and third-party software; know-yourcustomer and due diligence purposes; recruitment purposes; regulatory compliance; performance of a contract with you; compliance with legal obligation; marketing; litigation; events planning and hosting; in-house security; research, analysis, and other business purposes or legitimate interests.
- 5.3. We use your personal data for several different purposes. We must have a 'lawful basis' (i.e. a reason prescribed by law) for processing your personal data. Most commonly, we use your personal data in these circumstances:
- 5.3.1. where we need to perform the contract we are about to enter into or have entered into with you;
  - 5.3.2. where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
  - 5.3.3. where we need to comply with a legal or regulatory obligation; and
  - 5.3.4. where it is for our legitimate activities as an organization and compliant business.
- 5.4. When you send email or other communications to us, we may retain those communications to process your inquiries, respond to your requests or improve our services provided on our Platform. We may also collect information while providing our services to you. Our servers automatically record information that your browser sends whenever you visit our Platform.

## **6. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which they can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- 6.1. identity data – includes first name, maiden name, last name, title, date of birth and gender information
- 6.2. contact data – includes postal and billing address, email address, telephone number
- 6.3. financial data – includes bank account and payment details
- 6.4. transaction data – includes details about payments to and from you, and details of products and services you have purchased and used from us
- 6.5. technical data – includes internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website
- 6.6. profile data – includes your ID and password for our website, preferences, feedback, survey responses and opinions
- 6.7. usage data – includes information about how you use our website, member benefits, products and services, attendance at events or conferences
- 6.8. marketing and communications data – includes your preferences in receiving marketing and membership communications from us

## **7. IF YOU FAIL TO PROVIDE PERSONAL DATA**

If you do not provide us with certain personal information (for example, if you do not provide personal information that is mandatory on the membership enquiry form/'contact us' page), we might not be able to provide certain services to you as we process your application or request.

## **8. DATA ANONYMISATION AND USE OF AGGREGATED INFORMATION**

The information you give us is confidential and protected by law. The confidentiality of personal information is a priority for Cobranet. Your information may be converted into statistical or aggregated data in such a way as to ensure you are not identified or identifiable from it. Aggregated data cannot be linked back to you as a natural person. We may use this data for analytical and research purposes.

## **9. CONSENT AND ACCESS RIGHTS**

- 9.1. We will obtain your consent prior to collecting or processing your Personal Data. Where we intend to use the information for a purpose other than the purpose for which it was collected, prior to such use, we will request your consent.
- 9.2. No consent shall be sought, given or accepted in any circumstance that may engender direct or indirect propagation of atrocities, hate, child rights violation, criminal acts and anti-social conducts.
- 9.3. You may withdraw your consent at any time and may request access to your Personal Data in our possession. Such withdrawal will not affect the lawfulness of the processing of your Personal Data prior to the withdrawal of your consent. We can, however, deny you access to the information where we determine that your request is unreasonable.
- 9.4. You have the right to request the modification or amendment of your Personal Data in our possession.
- 9.5. In all cases of access or request for modification or amendment of Personal Data, we shall request sufficient identification to enable us to confirm that you are the owner of the data sought to be accessed, modified or amended.
- 9.6. Where you provide the Personal Data of a third party to us, you confirm to us that you have informed the owner of the data about the purpose for which the data is required and that you have obtained the consent of the owner of the data to provide the data to us for the purpose for which it is required and in accordance with this Privacy Policy.

## **10. PERSONAL DATA PROTECTION PRINCIPLES**

When we process Personal Data, we are guided by the following principles. Personal Data shall be:

- a) collected only for specific, legitimate and lawful purposes;
- b) processed lawfully for the purpose for which it was collected and not further processed in a manner incompatible with which that purpose(s);
- c) processed adequately, accurately and without prejudice to the dignity of the human person;
- d) adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed;
- e) accurate and where necessary, kept up to date;
- f) stored only for the period within which it is reasonably needed; and
- g) processed in a secure manner and protected against unauthorised or unlawful access or processing or accidental loss, destruction or damage.

## **11. SECURITY MEASURES**

We have put in place appropriate security measures to prevent your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage. To prevent unauthorised access to your information, we have implemented strong controls and security safeguards at the technical and operational levels. Our website uses Secure Sockets Layer/Transport Layer Security (SSL/TLS) to ensure secure transmission of your Personal Data. You should see the padlock symbol in your URL address bar once you are successfully logged into the platform. The URL address will also start with <https://> depicting a secure webpage. SSL applies encryption between two points such as your PC and the connecting server. Any data transmitted during the session will be encrypted before transmission and decrypted at the receiving end. This is to ensure that data cannot be read during transmission.

However, please note that in relation to any personal data you submit to us online, we cannot guarantee the security of information transmitted over the internet or that unauthorised persons will not obtain access to personal data. Cobranet is not responsible and has no control over websites outside its domain. We do not monitor or review the content of other party's websites which are linked from our website or media

platforms. Please be aware that we are not responsible for the privacy practices, or content of these sites. Cobranet will not accept any responsibility for any loss or damage in any manner, howsoever caused, resulting from your disclosure to third parties of personal information.

Where we collect any special category personal information about your ethnic background, sexual orientation, political opinions, religion, trade union membership, or criminal record, we will apply additional security controls to protect that data. Where we have given (or where you have chosen) a password which enables you to access an account, you are responsible for keeping that password confidential. We ask you not to share your password with anyone. We have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **12. ACCESS BY THIRD PARTIES**

We may share your Personal Data with third parties in the following circumstances:

- a) where we have your consent;
- b) when with our parent company(ies), subsidiary or affiliates;
- c) for the verification of our identity;
- d) we provide such information to other professional advisers or other trusted businesses or persons for the purpose of processing Personal Data on our behalf or other legitimate business purposes. We would require such parties to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures; and
- e) we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (i) satisfy any applicable law, regulation, legal process or enforceable governmental request, (ii) enforce applicable terms of service, including investigation of potential violations thereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, or (iv) protect against imminent harm to our rights, property or safety as required or permitted by law.

## **13. TRANSFER OF PERSONAL DATA OUTSIDE THE COUNTRY**

13.1. We may transfer Personal Data outside Nigeria in the following circumstances:

- a) with your consent;
- b) the transfer is necessary for the performance of a contract between you and Cobranet or the implementation of pre-contractual measures taken at your request;
- c) the transfer is necessary for the conclusion or performance of a contract concluded in your interest between the Company and another natural or legal person;
- d) the transfer is necessary for important reasons of public interest;
- e) the transfer is necessary for the establishment, exercise, or defense of legal claims; or
- f) the transfer is necessary in order to protect your vital interests; or of other persons, where you are physically or legally incapable of giving consent.

13.2. Upon the transfer of information outside Nigeria, some principles of data protection may be violated in the receiving country. By consenting to the processing of your Personal Data, you consent to the transfer of your Personal Data outside Nigeria.

## **14. RETENTION OF PERSONAL DATA**

14.1. We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a

complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. Where information is kept for a longer period, such as in back up storage, or archives, such information would be safeguarded in accordance with this Privacy Policy.

- 14.2. To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, reporting or other requirements.
- 14.3. Where any information retained is stored in an encrypted format, considerations must be taken for secure storage of the encryption keys. Encryption keys must be retained as long as the data that the keys decrypt is retained.
- 14.4. In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may retain and use this information indefinitely without further notice to you.

## **15. VIOLATIONS**

- 15.1. We will take swift action to remedy any suspected breaches of Personal Data.
- 15.2. We will not be responsible for any breach of Personal Data which occurs as a result of:
  - a) an event which is beyond our control;
  - b) an act or threats of terrorism;
  - c) any act of God (including but not limited to fires, explosions, earthquakes, floods, epidemics, or pandemics) which compromises our data protection measures;
  - d) war, hostilities (whether war be declared or not), invasion, act of foreign enemies, requisition, or embargo, rebellion, revolution, insurrection, or military or usurped power, or civil war which compromises our data protection measures;
  - e) the transfer of your Personal Data to a third party on your instructions; or
  - f) the use of your Personal Data by a third party designated by you.
- 15.3. If you know or suspect that a breach of Personal Data has occurred, or a violation of this Privacy Policy has occurred, you should immediately contact the Data Protection Officer at the contact information provided above.
- 15.4. Violations of this Privacy Policy by employees may result in disciplinary action.

## **16. YOUR LEGAL RIGHTS**

- 16.1. You have the right to:
  - a) Request access to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
  - b) Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
  - c) Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- d) Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- e) Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:
  - i. If you want us to establish the data's accuracy.
  - ii. Where our use of the data is unlawful but you do not want us to erase it.
  - iii. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - iv. You have objected to our use of your Personal Data but we need to verify whether we have overriding legitimate grounds to use it.
- f) Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- g) Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

16.2. If you wish to exercise any of the rights set out above, contact the Data Protection Officer at the contact information provided above.

16.3. You will not have to pay a fee to:

- a) access your Personal Data;
- b) change your Personal Data provided to us; or
- c) to exercise any of the other rights.

16.4. Notwithstanding the above, we will charge a reasonable fee where:

- a) any of your requests is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances if any criminal or illegal activity is suspected.
- b) you request to change your Personal Data in our possession more than three (3) times within a 12-month period.

16.5. We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

16.6. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 17. CONSENT

You accept this privacy policy when you give consent upon access to our platforms, or use our services, content, features, technologies or functions offered on our website, digital platforms or visit any of our offices for official or non-official purposes. This privacy policy governs the use of our platforms and services by users, unless otherwise agreed through a written contract. We may amend this privacy policy at any time by posting a revised version on our website or placing such notice at conspicuous data collection points.

#### **18. WITHDRAWING YOUR CONSENT**

Where we rely on your consent as the legal basis for processing your personal information, the section on how we use your personal information, you may withdraw your consent at any time by contacting us at [info@cobranet.ng](mailto:info@cobranet.ng)

If you would like to withdraw your consent or object to receiving direct marketing to which you previously opted in, you can do so using the unsubscribe link in that communication (if it is an email), by writing to us at [info@cobranet.ng](mailto:info@cobranet.ng) or using the contact details at <https://cobranet.ng/contact>. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

#### **19. OBJECTING TO OUR USE OF YOUR PERSONAL INFORMATION AND AUTOMATED DECISIONS MADE ABOUT YOU**

For any purpose(s) where we rely on our legitimate business interests as the legal basis for processing your personal information, you may object by emailing or writing to us at the address at the end of this policy.

Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise, we will provide you with our justification for why we need to continue using your data.

You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please email or write to us at the address at the end of this policy.

#### **20. ERASING YOUR PERSONAL INFORMATION OR RESTRICTING ITS PROCESSING**

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at [info@cobranet.ng](mailto:info@cobranet.ng) Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending, or you require us to keep it in connection with legal proceedings. In these situations, we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so; for example, for storage purposes, to protect the rights of another individual or company, or in connection with legal proceedings.

#### **21. TRANSFERRING YOUR PERSONAL INFORMATION IN A STRUCTURED DATA FILE ('DATA PORTABILITY')**

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with a contract, we've entered into with you, you may ask us for a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

## **22. CHANGES TO THE PRIVACY POLICY**

22.1. We keep our Privacy Policy under regular review.

22.2. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

## **23. CONTACT US**

If you wish to exercise any of your rights under this Privacy Policy, or know or suspect that a breach of your Personal Data or a violation of this Privacy Policy has occurred, or if you have any questions about this Privacy Policy or our privacy practices, please contact us at:

**Name:** Osinachi Agulanna

**Designation:** Legal Advisor

**Email:** osinachi.agulanna@cobranet.ng

**Office Address:** Plot 24, Block 10, Jeremiah Ugwu Street, Lekki Phase 1, Lagos

**Telephone:** 08079292227