

PRIVACY POLICY

NeGSt - TAS TECHNOLOGIES LTD is committed to protecting the privacy of our customers and users of this site, and endeavours to provide a safe customer and user experience. This privacy policy describes how your personal information is collected, used, shared, and secured (processed) and your choices regarding the use, access, and correction of your personal information.

Using this site or application, you agree to the collection, use and transfer of your data as described in this Privacy Policy.

This privacy policy is in furtherance of the Nigeria Data Protection Act (NDPA), Section 37 of the Constitution of the Federal Republic of Nigeria (CFRN) 1999 (as amended) and all other legal instruments designed to protect the privacy rights of natural persons.

As the “Data Processor”, we understand the privacy rights of all natural persons who are part of **NeGSt - TAS TECHNOLOGIES LTD** or interact with us on all our data processing mediums or platforms. These classes of people are our “Data Subjects”. As a responsible firm, we are committed to safeguarding the privacy rights of our data subjects through this strict privacy policy. It shall complement the extant legal regulatory framework as an internal standard of care we owe our “Data Subjects”.

WHO WE ARE

NeGSt - TAS TECHNOLOGIES LTD determines how and what type of data is collected and processed and what such data will be used for, including the measures it will take to protect such data. To that extent, **NeGSt - TAS TECHNOLOGIES LTD** is a Processor.

Our Registered Address is

*33, Oran Street,
Off Nouakchott Street,
Wuse Zone 1. Abuja.*

If you have questions about how we process personal data or would like to exercise your data subject rights, please email us at info@negsttas.com.ng

HOW AND WHY, WE COLLECT PERSONAL DATA

We collect personal data from you for one or more of the following purposes:

1. To initiate and complete commercial transactions with you, or the organisation that you represent, for the purchase of our products and/or services;
2. To provide you with information that you have requested or which we think may be relevant to a service we provide in which you have demonstrated an interest;

3. To fulfil a contract that we have entered into with you or with the organisation that you represent;
4. To manage any communication between you and us, and
5. To ensure the security and safe operation of our website and underlying infrastructure.

The table located further down this policy provides more detail about the data that we collect for each of these purposes, the legal bases for doing so, and the period for which we will retain each type of data.

In addition, to ensure that each visitor to any of our websites can use and navigate the site effectively, we collect the following:

- Technical information, including the Internet Protocol (IP) address used to connect your device to the Internet;
- Operating system and platform;
- Information about your visit, including the Uniform Resource Locators (URL) clickstream to, through, and from our site.

Our cookies policy, which can be viewed from the home page of our website, describes in detail how we use cookies

It includes personal data that is collected through our website, telephone and any related social media applications.

In the section about data subject rights below, we identify your rights in respect of the personal data that we collect and describe how you can exercise those rights.

OUR GUIDING PRINCIPLES ON DATA PROCESSING

In processing your data, we adhere strictly to the principles of data processing as set out in Section 24 of the Nigerian Data Protection Act(NDPA). As such, we shall ensure that Personal Data shall only be:

- a) Collected and processed by specific, legitimate and lawful purpose consented to by the Data Subject;
- b) Adequate, accurate and without prejudice to the dignity of the human person;
- c) Stored only for the period within which it is reasonably needed; and
- d) Secured against all foreseeable hazards and breaches such as theft, cyber-attack, viral attack, dissemination, manipulations of any kind, damage by rain, fire or exposure to other natural elements.

CONSENT OF DATA SUBJECT

Except as otherwise required by operation of law or principles of law, your consent as the Data Subject is the entry point for data processing. You have the right to give, withhold or otherwise withdraw your consent to data processing. For further understanding of the operation of the principle of consent under data processing see Section 25(1)(2). Those who seek information on our website or other platforms shall be deemed to have given constructive consent to receiving information of a specific or of general nature through us from time to time.

LAWFUL BASIS FOR THE PROCESSING OF PERSONAL DATA

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. Our business architecture, accounting and systems infrastructure and compliance organisation means that all personal data is processed on common, Group-wide platforms. We have processes in place to make sure that only those people in our organisation who need to access your data can do so. Several data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties and, where this happens, this is also identified below.

Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
1. To provide you with information	Subject matter information	Name, company name, geographic location, email address, business sector.	To provide appropriate online or email information about products and services that you have requested To provide appropriate and up-to-date information on data given by the 'data controller' for processing	Contractual fulfilment	Internally only	According to the contractual terms agreed upon.

Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
			To provide further, related, online or email information and ongoing news updates about the identified area of interest.	Legitimate interest	Internally only	6 months if a marketing email is left unopened
		Telephone number	Follow-up to ensure requested information meets needs and identify further requirements	Legitimate interest	Internally only	
		Personal contact information is provided through website forms or at trade shows or any other means.	General mailing list subscription	Consent	Internally only	

<p>. Transactional information</p>	<p>Transaction details</p>	<p>Name, physical address, email address, telephone number, bank account details (for credit accounts), another medium of content delivery</p>	<p>To process purchase transactions for products and services with customers, and to ensure any transaction issues can be dealt with.</p>	<p>Contractual performance</p>	<p>Internally only</p>	<p>Maximum 8 years from the date of the performance of the contract.</p>
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Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
			For accounting, taxation, financial projections and business development purposes	Statutory obligation and Contractual performance	Internally and professional advisers	6 months from the date the data subject inputs personal information but has not proceeded with a transaction.
			Documentation should any contractual legal claim arise	Legitimate Interest	Internally and professional advisers	8 years for VAT records from the performance of the contract
	Payment card data	Primary account number (PAN), cardholder name, service code, expiration date	To fulfil purchase requests using payment cards	Contractual performance	Payment card companies, all in line with PCI DSS	Only retained whilst authorisation is pending.
3. Fulfilment information	Fulfilment data	Name, dietary requirements	Appropriate catering arrangements for training courses	Contractual performance	Internally and training venues	Maximum 6 years from the date of the performance of the contract.

Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
		Name, contact and identification details	Access to training courses, attendance registers	Contractual performance	Internally and training venues	
		Name, contact and identification details address(es), email address,	Course attendance and issue of certifications	Contractual performance	Internally and externally certification bodies or supplier companies with whom we contract to fulfil these requirements.	
4. Security	Security information	Technical information, as described above, plus any other information that may be required for this purpose	To protect our website and infrastructure from cyber-attacks or other threats including reporting and dealing with any illegal activity.	Legitimate interest	Internally, forensic and other organisations with whom we might contract for this purpose.	Relevant statutes of limitation

Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
5. Communications	Contact information	Names, contact details, identification details	To communicate with you about any issue that you raise with us or which follows from any interaction between us.	Legitimate interest	Internally and, as necessary, with professional advisers.	Relevant statutes of limitation.

Please note that the categories of data and the lawful basis provided are not exhaustive. We are governed by the NDPA as to the requirement for consent in all circumstances.

Do note also that when we process on the lawful basis of legitimate interest, we apply the following 3 tests to determine whether it is appropriate:

1. **The purpose test** – is there a legitimate interest behind the processing?
2. **Necessity test** – is the processing necessary for that purpose?
3. **Balancing test** – is the legitimate interest overridden, or not, by the individual's interests, rights or freedoms?

TECHNICAL INFORMATION

Customarily, websites are designed to collect certain information from the visitor. Our website is also designed to collect your IP address and other information that your web browser typically shares with the websites that you visit. The purpose of this is to know you better and to automatically and dynamically engage with you through your actions on our website.

PURPOSE AND STORAGE LIMITATION

NeGSt - TAS TECHNOLOGIES LTD is a Nigerian-domiciled organisation whose primary office is in Abuja Nigeria.

- Our website is hosted in Nigeria and we have appropriate contractual and security measures in place to ensure that personal data is protected.
- Our customer relationship management, marketing and accounting systems for all our businesses are hosted in Nigeria
- We operate a data retention policy concerning all data, whether paper-based or digital and those aspects of it which relate to personal data are contained in the table above.

The purpose of data processing usually determines the length of time within which your personal data is stored with us and the residue of data stored for this purpose. We collect and store personal data that is reasonably required by law or best practice to serve you or respond to legitimate enquiries about our transaction with you. We take this responsibility very seriously in the knowledge of the need for you to enjoy your privacy as guaranteed under the 1999 Constitution of the Federal Republic of Nigeria and international human rights law.

SECURITY MEASURES

We use appropriate technologies and foolproof protocols to provide you with comprehensive layers of security in the area of personal data. Thus, we are constantly vigilant in preventing cyber-attacks, fraudulent intrusion, unauthorized access, loss or corruption of personal data. We are equally cognizant of the obligations imposed on us by law in terms of data protection. Accordingly, we conduct reviews of process and privacy impact assessment, carry out training and obtain strict warranties where applicable.

NeGSt - TAS TECHNOLOGIES LTD has what we believe are appropriate security controls in place to protect personal data which includes assessing risks to the rights and freedoms of data subjects. We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your information. We accept no liability in respect of breaches that occur beyond our sphere of control.

CAVEAT ON WEBSITE LINKS

Our website may contain links to other websites. Save and except as otherwise expressly stated by us, any link to another website is not covered by our privacy policy. We strongly advise that you should satisfy yourself with the details of any privacy policy provided on other websites or links.

TRANSFER TO THIRD PARTIES AND COUNTRIES

In carrying out our mandate effectively, we may require the services of third parties who may be within or outside the NDPA jurisdiction (Nigeria). Examples of such services include but are not limited to the following:

- a) Internet connectivity,
- b) cloud storage,
- c) data analytics,
- d) data security,
- e) software development, and
- f) Legitimate Public interest.

In transferring your data to third parties, we shall be guided by extant public policy and the NDPA as regards the adequacy level of the foreign jurisdictions.

Data Transfers Outside of Nigeria

NeGSt - TAS TECHNOLOGIES LTD will only transfer data outside of Nigeria in line with the Nigerian Data Protection Act set out below:

- Any transfer of Personal Data which is undergoing processing or is intended for processing after transfer to a foreign country or an international organisation shall take place subject to the other provisions of the NDPA. Or
- Where the Commission (NDPC) has decided that the foreign country, territory or one or more specified sectors within that foreign country, or the international organization in question ensures an adequate level of protection.

USE OF SPECIAL DATA PROCESSING CODES (COOKIES)

“Cookies”, in computer parlance, are text files that are downloaded to your browsing devices such as phones or computers when you browse pages of websites. They contain small amounts of data and their essential function is to intelligently memorize your preferences and therefore present them to you as choices when you are browsing – even at different times. Note that various websites use cookies for different purposes some of which may undermine your privacy rights. We have taken measures to ensure that all methods adopted by us to engage automatically with you do not violate your privacy rights under the NDPA. In the case of cookies, we ensure that they have security protocols and are not vulnerable to abuse by anyone.

YOUR RIGHTS AS A DATA SUBJECT

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email us via: info@negsttas.com.ng or use information supplied in the Contact Us section below. To process your request, we ask you to provide two valid forms of identification for verification purposes. Your are as follows:

- **The right to be informed**

As a data Processor, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.

- **The right of access**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients to whom the personal data has been disclosed
- d) The retention period or envisioned retention period for that personal data
- e) When personal data has been collected from a third party, the source of the personal data

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.

- **The right to rectification**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

- **The right to erasure/ 'right to be forgotten'**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

- **The right to restrict processing**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested
- b) Processing of the personal data is unlawful
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing

- **The right to data portability**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was based on consent, the processing is by automated means and the processing is based on the fulfilment of a contractual obligation.

- **The right to object**

You have the right to object to our processing of your data where Processing is based on legitimate interest;

Processing is for direct marketing;

Processing is for scientific or historical research;

Processing involves automated decision-making and profiling.

CONTACT US

Any comments, questions or suggestions about this privacy policy or our handling of your data should be emailed to

Alternatively, you can contact us at our head office using the following address or telephone numbers:

Address: 33, Oran Street, Off Nouakchott Street, Wuse Zone 1. Abuja.

Data Controller: *Abasiono Ufot*, 07035354008, abasiono.ufot@negsttas.com

Data Processing Officers: *Tony Olugbusi* - 08035732906 & *Obiagali Maureen Aneke* - 08037701791