



PRIVACY NOTICE:

INTRODUCTION:

Courteville Business Solutions Plc (“Courteville”, “we” or “us”) is fully committed to protecting the rights and privacy of individuals operating in accordance with the statutory legislation outlined within the Nigeria Data Protection Regulation 2019 and Courteville’s Data Protection Policy. Please read this Privacy Notice (“Notice”) to understand our policies, processes and procedures regarding our treatment of data.

This Notice explains how your personal data is collected and managed by Courteville, and how you can update and exercise your rights in respect of your personal data.

CONSENT:

By continuing to visit our website (www.courtevillegroup.com) and other Courteville Customer touch points, you accept and consent to the use of your personal data in line with our Data Protection Policy. You can withdraw your consent at any time but such withdrawal will not affect the lawfulness of processing based on consent given before its withdrawal.

LIMITATION:

Courteville website may provide links to third-party websites for your convenience and information. If you access those links, you have exited the Courteville website. Courteville does not control those websites or their privacy practices. The personal data or any data you choose to provide or that is collected by those third parties is not covered by Courteville’s Data Protection Policy.



WHAT INFORMATION DO WE COLLECT?

We will collect and process the following data about you:

1. Information and content you provide

We collect the content, communication and other information you provide to us when you use any of our product and services. These include when you;

- a. Fill forms, questionnaires or surveys
- b. Contact us with an enquiry or ask us to provide you with information
- c. Register on our website or leave any comments or reviews
- d. Attend any of our promotional events
- e. When you communicate with us via social media, third party applications or similar technologies, etc.;

2. Information we collect about you

With regard to each of your visit to our website, office or the use of our products, we may collect the following information;

- a. Technical information, including the Internet Protocol (IP) address used to connect your computer to the internet, your login information, browser type, time zone setting, browser plug-in types and versions, operating system and platform
- b. Information about your use of our website (including date and time), details of transactions you carry out, interactive information, record of any correspondence between us and any phone number used to call our customer service number
- c. Information about your visits from your IP address, products or services you viewed or searched for, page response times, download errors, page interaction information, etc.

WHAT DO WE DO WITH YOUR PERSONAL INFORMATION?

We may use your personal information to;

- Update and enhance our Courteville Customer database
- Establish your identity and assess applications for our products and services
- Pricing and designing our products and services
- Managing our relationship with you
- Identifying and investigating illegal activity



- Identifying and informing you about other products and services that we think may be of interest to you
- Communicating product and service features to you
- Notifying you of your obligations with respect to our products and services
- Notifying you of your legal and statutory responsibilities with regard to our proposals
- Processing your job application if you apply for a job with us
- We may also process your personal data to comply with provisions of applicable laws.

DISCLOSURE OF YOUR INFORMATION:

We respect your privacy and we limit disclosure of your Personal Data to third parties. We do not sell, give or trade any personal data that we obtain from you to any third party for data mining or marketing purposes. We may however share your information with the following categories of third party;

- a. Our service providers where necessary to make our products and services available to you e.g. logistic companies and IT infrastructure companies subject to appropriate data security and protection
- b. Where there is a regulatory or statutory obligation to disclose such Personal Data in accordance with provisions of applicable laws.

SECURITY AND RETENTION OF YOUR PERSONAL DATA:

We adopt robust technologies and policies to ensure the personal information we hold about you is suitably protected. We take steps to protect your information from unauthorized access and against unlawful processing, accidental loss, destruction and damage.

We have also taken measures to comply with global Information Security Management System (ISMS), and have put in place digital and physical security measures to limit or eliminate possibilities of data privacy breach incidents.

We take appropriate measures to ensure that your Personal Information is only processed for the minimal period necessary in line with the purposes set out in this



Notice or as required by applicable laws, until a time it is no longer required or has no use. We will never retain your personal data for a period longer than necessary.

LEGAL BASIS FOR USING YOUR PERSONAL INFORMATION:

We only use your personal information where it is permitted by laws that protect your privacy rights.

We will only use your personal information where;

- We have your consent (if consent is required)
- We need to use the information for legal purpose
- We need to use the information to perform a contract with you
- When processing is required to protect your vital interest and other legitimate interests
- Where processing is necessary for the performance of a task carried out in the interest of the public.

USE OF COOKIES:

Cookies allow a web server to transfer data to a computer or device for record keeping and other purposes. We may use cookies and other technologies to, among other things, better serve you with more tailored information and facilitate your ongoing access to and use of our website. Options are provided for you to either accept or reject the use of the cookies.

YOUR RIGHTS:

Courteville collects personal data only for the purposes identified in this Policy and such information cannot be reused for another purpose that is incompatible with the original purpose.

You can exercise the following rights with respect to your personal data with Courteville:

- a. Request for and access your personal data collected and stored by Courteville;
- b. Withdraw consent at any time. For example, you can withdraw your consent to receipt of our marketing or promotional materials or unsubscribe to our newsletters;
- c. Object to automated decision making;
- d. Request rectification and modification of personal data kept by Courteville;



- e. Request for deletion of your personal data;
- f. Be informed of and entitled to provide consent prior to the processing of personal data for purposes other than that for which the personal data were collected;
- g. Request that Courteville restricts processing of your personal data; and
- h. Request for information regarding any specific processing of your personal data.

CHANGES TO OUR PRIVACY NOTICE:

Due to constant changes in technology and regulatory requirements, we may need to change our privacy policies or update this Notice from time to time. You will always be able to find the most recent version of our updated Notice on this site.

CONTACT AND COMMUNICATION:

If you require further information on this Notice, you may contact us at our Head Office, 38, Commercial Avenue, Sabo, Yaba, Lagos or send an email to info@courtevillegroup.com.