

# Courteville Business Solutions Plc Privacy Notice

## 1. 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 governs your use of our Website: <https://courtevillegroup.com/> and explains how your personal data is collected and managed by Courteville, and how you can exercise your rights in respect of your personal data.

## 2. The personal data that we process

Personal data means any information about an individual from which that person can be directly or indirectly identified. While using the Website and our service, we process certain personal data directly to contact or identify you, and some automatically for our Website to function effectively. We also collect personal data through your use of our services or from third-party sources. The personal data we obtain include:

- Your name;
- Your email address;
- Contact number;
- Location;
- The IP address used to connect your device to the internet for identification purposes;
- Date and time of visit; and
- Web pages visited, duration and frequency of visit.

## 3. Cookies

Cookies are tools used to collect information from you when you visit our Website automatically. We 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. You may read our Cookie Notice (<https://courtevillegroup.com/>) to find out more about the cookies we use.

#### 4. Purpose of processing your data and the lawful basis

We collect your data to:

Purpose of Processing	Lawful Bases
<ul style="list-style-type: none"><li>▪ Update and enhance our Courteville Customer database</li><li>▪ Establish your identity and assess applications for our products and services</li><li>▪ Pricing and designing our products and services</li><li>▪ Managing our relationship with you</li><li>▪ To prevent fraud and crime on our platform</li></ul>	Legitimate Interest
<ul style="list-style-type: none"><li>▪ To provide our services to you</li><li>▪ To register you as a user</li><li>▪ To manage your account and profile</li><li>▪ To authenticate you when you log in</li><li>▪ To track your billing and payment history</li><li>▪ To communicate with you and for customer support</li><li>▪ To inform you whenever there are changes to our services</li></ul>	Contract
<ul style="list-style-type: none"><li>▪ To send marketing communications to you</li></ul>	Consent
<ul style="list-style-type: none"><li>● We process personal data to fulfil legal requirements where needed.</li><li>● To verify the identity of individuals or organizations trying to use our platform.</li></ul>	Legal obligation

#### 5. Your rights as a data subject

As a data subject, the law vests you with certain rights—they include the right to:

- a. access personal data we hold about you by requesting a copy of the personal data we hold about you;
- b. rectify such information where you believe it to be inaccurate;

- c. restrict the processing of your data in certain circumstances;
- d. object to the processing of your data where we intend to process such data for marketing purposes;
- e. where feasible, receive all personal data you have provided to us—in a structured, commonly used, and machine-readable format—and to transmit the information to another data controller;
- f. request the erasure of your data (also known as the right to be forgotten);
- g. withdraw your consent to the processing of your personal data; and
- h. Lodge a complaint with a relevant authority, where you have reason to believe that we have violated the term(s) of this Privacy Notice. (You may complain or seek redress from us within 30 days from the time you first detected the alleged violation).

You may seek to exercise any of the above rights at any time by sending us an email at [scmu@courtevillegroup.com](mailto:scmu@courtevillegroup.com). The supervisory authority is the National Information Technology Development Agency (NITDA), and the complaint can be sent via email at [dpo@nitda.gov.ng](mailto:dpo@nitda.gov.ng)

## **6. Who we share your data with**

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.

## **7. Retention of your data**

Your personal data or any other information collected will be stored for as long as necessary to fulfil the purposes described in this Notice. However, we will also retain personal data subject to relevant provisions of applicable laws, to resolve disputes, and enforce our legal agreements and policies.

Please note that your data may be retained for an extended period, notwithstanding your request to remove your data, where there is a legal requirement to do so.

## **8. How your data is stored**

We store and process your data on our database. We protect your data using physical, technical, and organizational security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are

firewalls and data encryption, physical access controls, and information access authorization controls.

Where there is an actual or suspected data breach capable of causing harm to your rights and freedoms, we will notify you without undue delay and use our best effort to remedy the violation within one (1) month from the date we notify you.

## **9. International transfer of data**

At present, we do not transfer internationally. This may change. Where personal data is to be transferred to a country outside Nigeria, we shall put adequate measures to ensure safeguards and security of the data.

Our data transfers to the countries that do not offer an adequate protection level are subject to the conditions under the Nigeria Data Protection Regulation (NDPR). We will therefore only transfer Personal Data out of Nigeria on one of the following conditions:

- Your consent has been obtained;
- The transfer is necessary for the performance of a contract between Us and you or implementation of pre-contractual measures taken at your request;
- The transfer is necessary to conclude a contract between Us and the third party in your interest;
- The transfer is necessary for reason of public interest;
- The transfer is for the establishment, exercise or defense of legal claims;
- The transfer is essential to protect your vital interests or other persons, where the Data Subject is physically or legally incapable of giving consent.

To obtain any relevant information regarding any transfers of your Personal Data to third countries (including the appropriate transfer mechanisms), please contact [scmu@courtevillegroup.com](mailto:scmu@courtevillegroup.com)

## **10. Security of your data**

We are very particular about preserving your privacy and protecting your 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 the 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. However, we cannot completely guarantee the security of any information you transmit via our Website, as the internet is not an entirely secure place. We are committed to doing our best to protect you.

## **11. Complaints**

If you are concerned about an alleged breach of privacy law or any other regulation by us, you can contact the Data Protection Officer (DPO) via [scmu@courtevillegroup.com](mailto:scmu@courtevillegroup.com)

The DPO will investigate your complaint and provide information about how your complaint is handled.

Please be informed that you may complain to the relevant data protection authority where your complaints are not satisfactorily addressed.

## **12. Changes to this notice**

We update our privacy notice from time to time. We will notify our users when we change it, and visitors will know this by checking the last date of update on this page whenever you visit.

## **13. Contact Us**

If you have any questions relating to this Notice, you can reach us at [scmu@courtevillegroup.com](mailto:scmu@courtevillegroup.com) or 38, Commercial Avenue, Sabo, Yaba, Lagos, Nigeria.

To contact our Data Protection Officer, kindly address your request to “The Data Protection Officer” at 38, Commercial Avenue, Sabo, Yaba, Lagos, Nigeria

Signed by Management