

GREENWICH REGISTRARS AND DATA SOLUTIONS LTD'S PRIVACY AND COOKIES POLICY

This Privacy and Cookies Policy (Policy) explains how we use cookies and the choices you have. Except as otherwise stated in this Policy, our Privacy Policy will apply to our processing of data that we collect via cookies. You can access our Data Protection Policy via this <https://greenwichregistrars.com/wp-content/uploads/2021/06/Data-Protection-Policy.pdf>

By using our website (by clicking, navigating or scrolling), you are consenting to our use of cookies in accordance with this Policy. If you do not agree to our use of cookies, you can prevent the installation of cookies through the settings of your browser or not use our website at all. However, if you disable the use of cookies, this might cause some parts of this website not to function properly for you and it may impact your user experience on this site.

What are Cookies?

Cookies are messages or small files that are placed on your web browser when you visit an internet site. Cookies are useful and do a lot of different things, including allowing a website to recognize a user's device, improving online experience etc.

How and Why do we Use Cookies?

We use cookies when you access our websites and our online products and services to make the site work better and to help us understand how you use our site.

Cookies enable us to offer tailored products and to understand the information we receive about you, including information about your use of other websites and apps, whether or not you have an account with us.

Cookies help us provide, protect and improve our products and services, by personalizing, tailoring and measuring the services and products we provide for satisfactory and safe experience. We also use them to help authentication of user, assess performance and functionality of our online products and services, and analytical research.

SECURITY OF PERSONAL DATA

We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data. We will store all your personal data on secure servers, personal computers and mobile devices, and in secure manual record-keeping systems.

The following personal data will be stored by us in encrypted form: your name, contact information, address, Bank details and BVN. Data relating to your enquiries and financial transactions that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.

RETAINING AND DELETING PERSONAL DATA

Our data retention policies and procedure are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data. Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

We will retain your personal data as follows:

- a. Your personal details will be retained for a minimum period of 24 hours following date of CV service order, and for a maximum period of 1^{1/2} years following date of CV service order.
- b. In situations where it is not possible to specify in advance the periods for which your personal data will be retained, we will determine the period of our retention policy.
- c. Notwithstanding the provision of the above paragraphs, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject.

YOUR RIGHTS

We have summarised the rights that you have under Data Protection Regulation. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

1. Your principal rights under Data Protection Regulation are:
 - a. the right to access;
 - b. the right to rectification;
 - c. the right to erasure;
 - d. the right to restrict processing;
 - e. the right to object to processing;
 - f. the right to data portability;
 - g. the right to complain to a supervisory authority; and
 - h. the right to withdraw consent.

You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

- a. To the extent that the legal basis for our processing of your personal data is:
 - i. consent; or
 - ii. that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- b. If you consider that our processing of your personal information infringes Data Protection Regulation, you have a legal right to lodge a complaint with a supervisory authority responsible for Data Protection. You may do so in the place of the alleged infringement.
- c. To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- d. You may exercise any of your rights in relation to your personal data by email to the dpo@gtlregistrars.com

<https://greenwichregistrars.com/wp-content/uploads/2022/03/GRDS-Data-Subject-Access-Request-Policy-8-9.pdf>

UPDATING INFORMATION

Please let us know if the personal information that we hold about you needs to be corrected or has been updated.

Third party sites and services

GRDS's websites, products, applications, and services may contain links to third-party websites, products and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties, which may include such things as location data or contact details is governed by their privacy practices and GRDS will

not be liable for any breach of confidentiality or privacy of your information on such sites. We encourage you to learn about the privacy practices of those third parties.

Amendments

This policy may be revised on an ad-hoc basis to reflect the legal, regulatory and operating environment and such revised versions will automatically become applicable to you. We will post any revisions we make to our Privacy Policy on this page and such revised policy becomes effective as at the time it is posted. We will notify you when any changes to our privacy policy have been made. We also encourage you to check this page from time to time for updates to this policy.

Promotional messages

GRDS may sometimes contact you with products or services that we think may be of interest to you. If you don't want to receive such promotional materials from us, you can opt out at any time by sending an email to dpo@gtlregistrars.com

Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to dpo@gtlregistrars.com

To contact our Data Protection Officer, kindly address your request to "The Chief Compliance Officer" at 274 Murtala Muhammed Way, Alagomeji, Yaba, Lagos, Nigeria.