



Website Privacy Policy

1. INTRODUCTION

VFD Group Plc (hereinafter referred to as “We”) recognizes the confidential nature of the Personal Data of Users (hereinafter referred to as “You”) collected through this Website (<https://vfdgroup.com/>) and takes responsibility to comply with the extant Data Protection Laws. We treat your Personal Data as confidential and are dedicated to protecting your privacy by providing you with the highest level of security at any point of interaction with the Website.

This privacy policy will inform you about we look after your personal data when you visit the Website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

2. DEFINITION OF TERMS

Consent means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the Processing of Personal Data relating to him or her.

Data Controller means VFD Group Plc (and words such as "our", we", or "us" shall be interpreted accordingly) or any other person who either alone, jointly or in common with other persons or as a statutory body determines the purposes for and the manner Personal Data is processed or is to be processed.

Data Subject means You, as an identifiable person; one who can be identified directly or indirectly, by reference to an identifier such as a number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity.

Data Protection Laws means the Constitution of the Federal Republic of Nigeria, 1999, the Nigeria Data Protection Regulation 2019 (NDPR), the NDPR 2019 Implementation Framework, and any relevant data protection laws.

Data Protection Officer (DPO) refers to our designated personnel assigned with the duties of ensuring compliance with Data Protection Laws, our relevant data privacy instruments and data protection directives.

NITDA means the National Information Technology Development Agency.

Personal Data means any information relating to an identified or identifiable natural person ('Data Subject'). It can be anything from a name, address, photo, email address, identification number, location data, online identifier, bank details, posts on social networking websites, medical information, and other unique identifier including MAC address, IP address, IMEI number, IMSI number, SIM, to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal Data Breach refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.

Policy means this Data Privacy Policy.

Process or Processing refers to any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Pseudonymisation means replacing information that directly or indirectly identifies an individual with one or more artificial identifiers or pseudonyms so that the person, to whom the data relates, cannot be identified without the use of additional information which is meant to be kept separately and secure.

Third Party means any natural or legal person, public authority, establishment or any other body other than you and us.

3. SCOPE

This Policy applies to all Personal Data that we process from this Website. This Policy is incorporated into our Terms of Service. As such, if you make use of the Website or any of our services, this Policy will apply to you.

You are required to read and understand the content of this Policy before using the Website or our services. This Website is not intended for children and we do not knowingly process data relating to children.

4. CONSENT

By using this Website and any of our services made available to you, you consent to our collection and use of your Personal Data.

5. THE DATA WE COLLECT ABOUT YOU

For a better experience while using the Website and enhancement of the services we provide, we may process your Personal Data such as:

Identity Data which includes your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data which includes your delivery address, email address and telephone number(s);

Transaction Data which includes details about any payments to and from you using our services and other details of products and services you have purchased from us;

Technical Data which includes internet protocol (IP) address, your 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.

Usage Data which includes information about how you use the Website, products and services;

Marketing and Communications Data which includes your preferences in receiving marketing from us and Third Parties and your general communication preferences.

5.1 LAWFUL BASIS

VFD will process your data on a lawful basis which fall under at least one of the following

- **Consent:** With your full consent as laid down by GDPR for your personal data that require consent e.g., marketing purpose
- **Performance of a contract:** this includes activity necessary to enter into or perform a contract with the data subject
- **legitimate Interest:** This involves using of data for the purpose it's collected for otherwise with full consent of the data subject
- **Legal Requirement:** If required by legal and governmental body legal obligation and you might not necessarily be consented depending on the statement of law concerning the processing request
- **Vital Interest:** This is a rare processing activity that could be required to save someone's life, most seen in emergency medical care situations.
- **Public Interest:** A processing activity that would occur by a government entity or an organization acting on behalf of a government entity.

6. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect Personal Data from and about you including through:

Direct interactions: You may give us your Identity and Contact Data by filling forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you apply for our products or services; subscribe to our service or publications; request marketing to be sent to you; enter a competition, promotion or survey; or give us feedback or contact us.

Automated technologies or interactions: As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs, pixel tags and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

Third parties or publicly available sources: We may receive Personal Data about you from various third parties and public sources such as Technical Data from analytics providers; advertising networks; and search information providers, and Identity and Contact Data from data brokers or aggregators.

7. LEGAL BASES FOR PROCESSING YOUR PERSONAL DATA

We process your Personal Data on the following legal bases: (a) upon obtaining your consent to do so; (b) where processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract; (c) where processing is necessary for compliance with a legal obligation to which we are subject, (d) where processing is necessary to protect your vital interests or those of another natural person and (e) where processing is necessary for the performance of a task carried out in the public interest or in exercise of official public mandate vested in the controller.

8. YOUR RIGHTS AS A DATA SUBJECT

You have the right to determine how we handle your Personal Data subject to the Data Protection Laws. These include the following rights to: (a) request access to your Personal Data; (b) withdraw consent to our Processing of Personal Data; (c) request Personal Data be erased, deleted or corrected; (d) request a copy of the safeguards under which Personal Data is transferred outside of Nigeria; (e) request that your Personal Data be transferred to another Data Controller; (f) report any concern on how we handle your Personal Data to the NITDA although we are happy to respond to any concerns you send to us directly to dpo@vfd-mfb.com

Whilst information requests are free, we may charge a fee where such requests have become manifestly unfounded or excessive. Where we are unable to provide any information, you request for, we shall inform you without delay and at the latest within one month of receipt of your request, giving the reasons for not acting.

9. TRANSFER OF PERSONAL DATA

We may share your Personal Data with any of any member of our group, which means our Affiliates (a company in which we have an ownership stake). We may also disclose your personal information to Third Parties in the following circumstances: (a)with companies and people we work with on a contractual basis to help us provide our services; (b)to contact you in relation to any correspondence we receive from you or any comment or complaint you make about our products or services; (c)whilst we will not disclose information about identifiable individuals to our advertising partners, we may give them collective information about our user base and to use such information to help advertisers reach a more tailored audience; (d)where it is necessary for the conclusion or performance of a contract; (e)for important reasons of public interest; (f)for the establishment, exercise or defence of legal claims; (g)to correct technical problems and malfunctions and (h)where transfer is necessary in order to protect your vital interests or of other persons, if you are physically or legally incapable of giving Consent.

10. RETENTION OF PERSONAL DATA

We are required to keep full and accurate records of all our data processing activities. We will retain your personal information only for the period reasonably required to fulfill the purposes for which it was collected.

You have a right to request for your Personal Data to be deleted or erased. We will determine if such request can be complied with and where a determination is made to refuse your request, the DPO shall notify you of our decision and the reason for the refusal.

11. DATA SECURITY AND PERSONAL DATA BREACH

We are required to maintain appropriate safeguards to protect your Personal Data and safeguarding will include the use of encryption and Pseudonymisation techniques where appropriate. We regularly evaluate and test the effectiveness of these safeguards to ensure security of our Processing of your Personal Data. Whilst we value your trust in providing us with your Personal Data and we remain committed to using commercially acceptable means to protect it, we understand that channels of transmission of Personal Data over the internet are not 100% secure and reliable.

Where there is an unauthorized access to or exposure of your Personal Data, we will take immediate measures to stop such unauthorized exposure or access, assess the risks posed by such and take steps to mitigate any adverse effects it may pose. We shall notify the NITDA within 72 hours of knowing about a Personal Data Breach and inform you where we believe such breach will likely result in high risks to your freedom and rights.

12. TRACKING TECHNOLOGIES

Cookies, log files, and pixel-tags (Web beacons) are technologies that could be used by the Website to identify you as you use the Website or as you click on an online advertisement located on a Third-Party

website. Your browser allows us to place information on your computer's hard drive that helps identify your computer and we may use this to personalize the Website for your use.

You may set your browser to allow you determine whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to you. If your browser is set to reject cookies, websites that are cookie-enabled will not recognize you when you return to the website, and some website functionality may be lost. Occasionally, we contract with Third Parties to place cookies on your computer's hard drive.

Although cookies, generally, do not contain personally identifiable information, if you have provided us information about yourself, we may associate your registration information with cookies or other tracking utilities that the Website places on your computer's hard drive. Associating a cookie with your registration data allows us to offer increased personalization and functionality. Without cookies, such functionality would not be possible.

Furthermore, we may use other tracking systems like pixel-tags. Pixel tags are similar in function to a cookie and are used to pass certain information to our servers to personalize our website and to track your usage across other websites where our online advertisements are located.

13. LINKS TO OTHER SITES

The Website may contain links to other websites. If you click on a Third-Party link, you will be directed to that site. Please note that we do not operate or control these external websites and advise you to review the privacy policies of these websites. We assume no responsibility for the content, privacy policies, or practices of any Third-Party sites or services.

14. CHANGES TO THE POLICY

This Policy is effective as of August 2021 and will remain in effect subject to any changes or amendments to its provisions.

We keep the Policy under regular review and may update it from time to time to reflect best practice and to ensure compliance with any changes or amendments to the Data Protection Laws. We will notify you when any changes are made to this Policy through this page. As such, we advise you to review this page periodically for any changes. These changes become effective immediately they are posted on this page and our continued use of the Website or our services after such changes shall constitute your acknowledgment and acceptance of the modified Policy.

15. CONTACT

In providing your telephone, facsimile number, postal and e-mail address, or similar details, you agree that we and/or our Affiliates may contact you by these methods to keep you informed about our products and services and for such reasons that may enhance our service delivery to you.

If you have any questions or comments about this Policy, do not hesitate to contact us through our DPO,

Email: dpo@vfd-mfb.com

who will be happy to address your concerns and respond to your comments?