

CREDITREGISTRY PRIVACY POLICY

This Privacy Policy applies to all websites and web applications which link to this policy and are published by CreditRegistry.

If you wish to amend any of the personal information that we hold about you, or update your marketing preferences, you can do so at any time through your account.

If you have any queries about how we use your personal information, please contact our Data Protection Officer at dpo@creditregistry.ng.

INFORMATION WE COLLECT

This section details the information we may collect about you. We explain why, and how, we use it in later sections.

Account information

If you decide to create an account or enquire about one of our products or services, we'll ask you to provide us with some specific information, for example:

- **Basic personal details** - such as name, title and date of birth.
- **Personal contact details** - such as home address, delivery address, home phone number, mobile phone number, and email address.
- **Work details** - such as job title, department, company name, company address, work email address and office phone number.
- **Log in details** - such as username and password.
- **Payment details** - such as your bank account and payment card information.
- We may also use your account information, such as your title, name, and country, to infer your gender.
- CreditRegistry also collects non-personal information on your activities in the Services, such as your Internet Protocol address, and time of Your requests or actions on the website and referring website addresses, hardware type, operating system version, browser type, and language.

Additional information

On occasion, we will ask you to voluntarily provide additional information, for example:

- Your opinion of our products and services;
- Your preferences, including newsletters;

- Information we obtain from partners and public sources. We collect information about you from our partners or from publicly available sources to help us better understand our audience and enhance the relevance of our content and marketing.
- We also use third-party search and prospecting information providers to find personal information people who may benefit from our service.

Information we obtain through cookies and similar tools

We use cookies (and similar technologies) and analytics tools across our Sites to collect information about you. This information can be used to improve the performance of the site, make advertising more relevant and enhance your user experience. We provide detailed information about cookies and similar technologies within our Cookie Policy; examples include:

- **Your location** - we use cookies to display the version of the site that is most relevant to your location.
- **Your usage** - we use cookies to understand how our customers use our Sites and interact with our communications and journalism. For example, we use technology on our Sites which records user movements, including page scrolling, clicks and text entered. This helps us to identify usability issues and improve the assistance we can provide to users and is also used for aggregated and statistical reporting purposes.
- **Your device** - we use cookies to understand what type of device you are using to show you the best version of the site.
- **Your engagement with advertisements** - we use cookies to understand what advertisements you have been shown, or clicked on, to bill our advertising partners, and to present you with advertisements that are more relevant to you.

LAWFUL BASIS FOR PROCESSING

We only process personal information where we have a lawful basis for doing so, such as the following:

- **User consent:** This is where you have given us permission to process personal information for a given purpose.
- **Legitimate business purposes:** This is where we have a legitimate interest, as a business, to process personal information. For example, where we are aware of copyright infringements on our Site, it is in our legitimate interests as a business to identify those responsible. We take due care to balance our interests against your right to privacy.
- **Contractual necessity:** This is where we must process personal information to meet our contractual obligations.

- **Legal obligation:** This is where we have to process personal information in order to comply with the law.

HOW WE USE YOUR PERSONAL INFORMATION

We collect personal information for the following main reasons:

- **To provide our service:** We require some of your basic personal information so our services work as you would expect, for example, providing access to our digital content, notifying you of changes to our services and dealing with customer services queries. Our Customer Care team may need to access your account to assist you with queries.
- **To improve and maintain performance:** To provide you with the best possible user experience and value, we need to make sure that our products and services work as they should. Using personal information helps us understand how you experience our Sites and services, so we can make improvements.
- **To bill our customers:** We, along with our authorised payments processors, securely process your payment information to take payments, give refunds and to detect and prevent fraudulent activity. We will also update your payment information if a payment is unsuccessful. You can manage your payment information at any time by contacting us.
- **To monitor compliance with our policies and terms:** We monitor for breaches of our terms and conditions and copyright policies. We also monitor activity on our Sites to detect and prevent invalid or fraudulent traffic.
- **To personalise our products and services:** We improve your experience of our products and services by personalising parts of our Sites and apps with the information you give us and what we learn about you. This includes showing you articles you may be interested in and recommending emails you may wish to sign up to. Where our Sites have such functionality, you can manage elements of personalisation in your account.
- **To communicate product changes and offers:** We will contact you with carefully curated CreditRegistry offers and promotions, exclusive event invitations. We also personalise our communications for strategic purposes.
- **For advertising:** We need to process your information to understand the effectiveness of the advertising we serve to you and others, and to deliver relevant personalised advertising. We use the information you give us, the information we collect about you, and the information we infer, to serve you with the most appropriate advertisements. You can manage your advertising settings for the Sites that carry out this activity in your account. If you do decide to turn off personalised advertisements or advertisements tailored to you, you will still see the same number of advertisements but they may be less relevant to you. You may continue to see advertisements that are

targeted to you based on other non-personal information, for example, the article that you are reading.

- To build directories – To process personal information to create databases and directories. These directories provide key business insights and profiles to those that have licensed access.
- To administer prize draws and competitions: If you enter a prize draw or competition, we will process your information to run the competition or administer the prize draw. For example, we will process your address information if you are a winner, and we need to send your prize by post. We may be required to publish or otherwise make available your name and/or region if you are selected as a winner in a competition or prize draw.
- For diversity & inclusion initiatives: We rely on information, such as gender, or inferred gender, and ethnicity to understand the composition of our audience and ensure that our products and services are engaging across our audience.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We disclose personal information to facilitate the running of our business or to provide specific services you have requested. Commonly, we will disclose information to:

Service providers

We engage service providers who help to support our business and improve our products. These service providers include, for example, fulfilment providers for delivery of our digital content and marketing; customer service agencies; hosts, organisers and sponsors of our events; organisations that host our Sites, events or databases; and providers of online surveys.

Advertisers

We, and our advertising partners, use cookies to collect personal information and serve you with advertisements that we believe are relevant to you and your interests. There is more specific information about our advertising partners and data sharing in our Cookie Policy.

Social media providers

Information will be shared with social media platforms where you log in to our Sites via a social media account, or use components on our Sites provided by social media platforms (e.g. the “Facebook Recommend” function). We also share the information of our customers with social media partners for the following reasons:

- To prevent existing subscribers from being targeted with subscription offerings on social media platforms.
- For the purposes of targeted advertising on social media platforms, and to create lookalike audiences for these purposes.
- To encourage users to get the most out of their subscription.

Other users

Our Sites are publicly accessible.

Legal processes and successors in title

We, and our suppliers, may also disclose your information to comply with applicable laws, court orders or other valid legal processes, and to enforce or apply our terms of use, any subscription agreement, or any of our other rights. We may transfer or disclose your personal information to any entity which takes over or acquires CreditRegistry.

We also share aggregated, non-identifiable information with third parties. Before sharing this information, we ensure that it cannot identify you as an individual. For example, we regularly release information about the size and growth of our audiences.

HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

We retain most of your personal information for as long as your account is active and therefore open; this allows you to continue accessing our content, products and services.

CreditRegistry retains the Personal Information collected pursuant to this Privacy Policy for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. The criteria used to determine the period of storage of Personal Information is depends on the applicable legal basis for the processing of Personal Information: e.g. where the processing of Personal Information is necessary for the performance of a contract, CreditRegistry retains the Personal Information as long as it is necessary for the fulfillment of the contract or the initiation of a contract; or, where the processing of Personal Information is necessary for complying with a legal obligation, CreditRegistry retains the Personal Information for the respective statutory retention period; or, where the processing of Personal Information is permissible for the purposes of the legitimate interests pursued by Us, such as marketing, CreditRegistry retains the Personal Information as long as it is permitted by law.

Thereafter, if the collected Personal Information is no longer needed for purposes specified in this Privacy Policy, CreditRegistry will delete Personal Information in its possession within a reasonable timeframe or render it anonymous, meaning “non-personal information”.

RIGHTS OF THE DATA SUBJECTS AND CONTACT INFORMATION

Under data protection laws, you may have rights as an individual in relation to the personal data we hold about you. These rights include:

Right to access, correct and object

You may contact us, and we will inform what Personal Information we have collected and processed regarding you and the purposes such data are used for. You have the right to have corrected any incorrect, incomplete, outdated, or unnecessary Personal Information stored about you by contacting us.

You may object to certain use of Personal Information, including direct marketing, if such data are processed for other purposes than purposes necessary for the performance of our Services or for compliance with a legal obligation. You may also object any further processing of Personal Information after prior given consent. If you object to the further processing of Personal Information, this may lead to fewer possibilities to use our Services.

Right to deletion and restriction of processing

You may also ask us to delete your Personal Information from our systems. We will comply with such request unless we have a legitimate ground to not delete the data. After the data has been deleted, we may not immediately be able to delete all residual copies from all our systems. Such copies shall be deleted as soon as reasonably possible.

You may request us to restrict processing of certain Personal Information, this may however lead to fewer possibilities to use our website and other Services.

Right to data portability

You have the right to receive Personal Information provided by you to us in a structured, commonly used format.

How to use the rights

These rights may be used by sending an e-mail to us on info@creditregistry.ng , including the following information: name, phone number, login information and details of the Services you have used. We may request the provision of additional information necessary to confirm your identity. We may reject requests that are unreasonably repetitive, excessive, or manifestly unfounded.

CHANGES TO THIS PRIVACY POLICY

This policy is effective from October 2nd, 2018.

Any changes we may make to this privacy policy will be posted on this page. If changes are significant, we may choose to notify you by email or to clearly indicate on our home page that the policy has been updated.

Our Contact:

For further information or clarification on this notice, feel free to contact CreditRegistry using:

CreditRegistry
13c Eko Pearl Tower A
Eko Atlantic City, Lagos
dpo@creditregistry.ng
info@creditregistry.ng