

CBC EMEA Privacy Policy

CBCemea Group is a leading information technology company registered under the Laws of the Federal Republic of Nigeria and has been providing top-notch services within and outside Nigeria for over 3 decades.

Reference in this notice to “personal data” means any information that identifies, or could reasonably be used to identify, a living individual, either on its own or together with other information. Please also refer to our Cookie Policy, which explains the use of cookies via our website.

Introduction

This Privacy Policy sets out how we handle the personal data of our customers, suppliers, end users and other third parties.

Who is responsible for data protection and data security?

Maintaining appropriate standards of data protection and data security is a collective task undertaken by CBC emea and all its staff. CBC emea has overall responsibility for ensuring that all personal information is collected, processed and stored in compliance with the requirements of applicable data protection laws, namely the [Nigerian Data Protection Regulation 2019](#)

Types of personal data collected directly

‘Personal Information’ is any information relating to an identified or identifiable individual (or ‘data subject’). Such information we collect depends on the products and services used or subscribed to. Such data includes, but is not limited to, the following:

- Basic information such as Name, title, employer, age, company name, job title;
- Contact information such as address, telephone numbers, email address, country of residence, user name, passwords,
- technical information (including your IP address): Information obtained from a visit to our website;
- Results of any credit background checks; or result of background checks conducted during recruitment processes
- Location data;
- Log files;
- Any debit or credit card information, bank account details including sort code and account number, and any payment history;
- Direct mailer lists; and

- Credit reference checks.

How We Collect your Personal Information

We may collect personal information directly from you when you:-

- communicate with us (for example when you submit an application form to become our customer, or when you contact us for any enquiries including by calling our customer service)
- register or subscribe for a specific Product and/or Service ()
- use our network and other Products and/or Services of CBC emea
- participate in any of our surveys
- register interest and/or request for information of (through our online portals or other available channels) or subscribe to our Products and/or Services
- respond to any marketing materials we send out
- commence a business relationship with us (for example, as a service provider/business partner)
- visit any of our offices
- visit or browse our websites
- lodge a complaint with us
- provide feedback to us (for example via our websites or in hard copy)

Other than personal information obtained from you directly (as detailed above), we may also obtain your personal information from third parties we deal with or are connected with you (credit reference agencies or financial institutions), and from such other sources where you have given your consent for the disclosure of information relating to you, and/or where otherwise lawfully permitted.

Types of personal data collected via use of the website (“Cookies”)

We use cookies and other similar technologies to collect data when the following sites are visited www.cbceamea.com; and www.clicksat.net. Cookies are files that store information on a computer hard drive or browser, including IP addresses, that allows CBC emea to recognise when an individual has visited the Sites before. Further information about the types of cookies we use and how we use them can be found on our website.

How we use personal information

We may collect and use personal information from you or from the category of third parties identified in this Privacy Policy, for one or more of the following purposes:-

- to verify your identity
- to assess and process your application(s) /request(s) for our Products and/or Services
- to provide you with the Products and/or Services you have requested
- to administer and manage the Products and/or Services we provide you (including charging, billing, facilitating payments and collecting debts)

- to investigate and resolve any service issues, billing queries, complaints or other enquiries that you submit to us regarding our network, Products and Services with our customer relations teams
- to assess and/or verify credit worthiness
- to detect and prevent fraudulent activity
- to manage our networks
- to keep in contact with you and provide you with any information you have requested
- to engage in business transactions in respect of Products and/or Services to be offered and provided to you
- to establish and better manage any business relationship we may have with you
- to process any communications you send us (for example, answering any queries and dealing with any complaints and feedbacks)
- to help us monitor and improve the performance of our network, Products and Services, our customer relations teams and service providers and the Site and to make these more efficient
- to maintain and develop our business systems and infrastructure, including testing and upgrading of these systems
- to manage staff training and quality assurance
- to notify you about benefits and changes to the features of our Products and/or Services
- to determine how we can improve services to you
- to produce data, reports and statistics which shall be anonymized or aggregated in a manner that does not identify you as an individual
- to investigate, respond to, or defend claims made against, or involving the CBC emea
- to conduct marketing activities (for example, market research)
- to maintain records required for security, claims or other legal purposes
- to comply with legal and regulatory requirements
- for any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities

Disclosure of Your Personal Information

As a part of providing you with our Products and/or Services and the management and/or operation of the same, we may be required or need to disclose information about you to the following third parties:

- law enforcement agencies
- government agencies
- companies and/or organizations that act as our agents, contractors, service providers and/or professional advisers
- companies and/or organizations that assist us in processing and/or otherwise fulfilling transactions and providing you with Products and/or Services that you have requested or subscribed for
- our business associates and other parties for purposes that are related to the purpose of collecting and using your personal information

- other parties in respect of whom you have given your express or implied consent

Subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to CBC emea.

Marketing

We may send you by post or email details of products, services, special offers, promotions and other information that we think may be of interest to you. Third parties may also, working on our behalf, market to you via telephone, email and/or direct mail. From time to time we may also contact you for customer research purposes. You can unsubscribe from such communications at any time, by the unsubscribe link found at the bottom of every marketing email.

Consent

Personal Information can only be processed on the basis of one or more of the lawful bases set out in the Data Protection Laws, one of which includes consent. Consent is obtained if the data subject concerned has indicated his or her agreement clearly either by a statement or positive action to the processing. Express consent is usually required for processing sensitive Personal Information, for example, racial or ethnic origin, political opinions, genetic or biometric data, sexual orientation.

CBC emea obtains such consent by notification at the time information is collected, through an 'opt-in' option to receive marketing materials at all points of data capture. To comply with the Data Protection Laws, CBC emea is required to evidence that consent was captured at the necessary time and must maintain records of all such consents and withdrawals.

Data subjects must be easily able to withdraw their consent at any time and withdrawal will be promptly implemented by CBC emea following receipt by it of any such written request (please see 'Data subjects' rights' section below for further information).

Retention

We will delete your personal data when it is no longer reasonably required for the Authorized Uses or you withdraw your consent (whichever is applicable). We may retain certain Personal Information for any residual aspect of the purposes set out above, or to comply with accounting tax rules and regulations, the specific retention requirements of which differ or to the extent we deem it necessary to assert or defend legal claims during any relevant retention period. In all circumstances, however, Personal Information will not be retained longer than is necessary in relation to the purpose for which such data is processed.

Certain customer, supplier or end-user account information will be held for 6 years from the end of any contract with us, to ensure we comply with our legal and regulatory obligations (even if the services are no longer being provided).

We will keep any contact information for a reasonable period of time after a contract has ended, in case the data subject chooses to use our services or products again. In such event and unless the data subject has opted out of marketing, we may contact them about our services or products during this time.

Protection of Personal Information

The Personal Information we collect is stored by us and/or our third party service providers on databases protected through a combination of physical and electronic access controls and integrated management systems, firewall technology, encryption and other reasonable organisational, technical and administrative measures. Once the Personal Information has been received, these strict procedures and security features are in place to prevent unauthorised access.

Data subjects' rights

All data subjects have the right to:

- control how his/her Personal Information is used by being asked to provide his/her consent to any collection or processing of the data, prior to this being permissible;
- request to review, correct, update or erase the information previously provided to us;
- request access to the information;
- request it be transferred to another person or organisation; and
- issue a complaint

All such requests should be in writing using the contact information listed below under the 'Contact' section. For any excessive or repeated requests, we may charge a reasonable administrative-cost fee.

SECURITY

We have in place appropriate technical and security measures to prevent unauthorized or unlawful access to or accidental loss of or destruction or damage to your information. When we collect data through the Site, we collect your personal details on a secure server. We use firewalls on our servers. When we collect payment card details electronically, we use encryption by using Secure Socket Layer (SSL) coding. While we are unable to guarantee 100% security, this makes it hard for a hacker to decrypt your details.

UPDATES

We reserve the right to amend this Privacy Policy from time to time and the updated version shall apply and supercede any and all previous versions, including but not limited to, leaflets or hard copy versions. Please check our Site for information on our most up-to-date practices.

Contact – questions or complaints

Questions, comments and requests regarding this Policy are welcomed and should be addressed to CBC Data Protection Team, The Company Secretary, CBC emea Group, 11, Olubunmi Owa Street, Lekki Phase 1, Lekki, Lagos or can be emailed to info@cbcemea.com