

U-LAW TECHNOLOGY ADVISORS PRIVACY POLICY

U-Law Technology Advisors (“**U-Law**”) takes its responsibilities with regard to the management of personal data very seriously, and we do not take lightly the trust you have reposed in us in providing us with your personal information. This Policy describes how U-Law processes your Personal Data, but it may not address all possible data processing scenarios. This Privacy Policy is a guide to help you understand:

- (1) The Information We Collect
- (2) How We Collect and Use Your Data
- (3) Consent and Access Rights
- (4) Legal Basis for Processing Personal Data
- (5) Your Rights
- (6) Personal Data Protection Principles
- (7) User Responsibility
- (8) Data Security
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- (10) Third Party Access
- (11) Violation of Privacy
- (12) Data Retention
- (13) International Data Transfer
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1. The Information We Collect

We collect the following information from customers and visitors of our website: names, email addresses, phone numbers, addresses, IP addresses, financial details and other information in combination with these identifiers. Regarding suppliers/contractors, we collect financial details and contract details. We also collect employee and applicant information such as: curriculum vitae, cover letter, contact details, professional experience and qualifications, interview notes, employment history, qualifications, payroll and tax information, health and safety records, work schedules and performance evaluations.

2. How We Collect and Use Your Data

- 2.1 U-Law collects the above-mentioned information using forms, email, physical requests, cookies, and web tokens.
- 2.2 When you send an email or other communications to U-Law, we may retain those communications in order to process your inquiries, respond to your requests, and improve our services. When you access U-Law’s services, our servers

automatically record information that your browser sends whenever you visit a website.

- 2.3 We use the above-mentioned information for research, regulatory compliance, marketing, business development, publicity, human resources management, recruitment, events planning and hosting, in-house security and analysis, key business operations, processing or carrying out tasks to fulfill business goals or objectives and purposes that are agreed with the Data Subject.

3. Consent and Access Rights

- 3.1 We require your consent for the processing of your data in specific instances. We shall obtain your consent for individual matters, where any document deals with different matters.
- 3.2 If we intend to use your data for any purpose different from the purpose for which your data was obtained, we will seek your consent prior to the use of your data for that other purpose.
- 3.3 You may withdraw your consent in writing at any time and may request access to your personal information in our possession at dpteam@uubo.org. Withdrawal of consent shall not affect the lawfulness of processing carried out prior to such withdrawal. We may restrict or refuse access to personal information where permitted or required by applicable law.
- 3.4 You reserve the right to request the modification or amendment of your personal data in our possession.
- 3.5 In all cases of access or modification/amendment of personal information, we shall request sufficient identification to enable us to confirm that you are the owner of the data sought to be accessed or modified/amended.

4. Legal Basis for Processing Personal Data

We may process your personal data based on the following legal bases:

- a) **Contractual necessity:** Where the processing is necessary for the performance of a contract that you have entered with us or in order to take steps at your request prior to entering into a contract;
- b) **Consent:** Where you have given consent to the processing of your personal data ;
- c) **Legal obligations:** Where the processing is necessary for compliance with our legal obligation;

- d) **Vital Interests:** Where the processing is necessary in order to protect the vital interests of a data subject;
- e) **Legitimate interests:** Where the processing is based on our legitimate interests provided that it does not override your rights and freedoms; and
- f) **Public interest** – Where the processing is necessary for the performance of a task carried out in the public interest.

5. YOUR RIGHTS

You have rights in relation to the way we handle your personal data. These include the following rights:

- a) where the legal basis of our processing is consent, to withdraw that consent at any time;
- b) to ask for access to the personal data that we hold;
- c) to prevent our use of the personal data for direct marketing purposes;
- d) to object to our processing of personal data in limited circumstances;
- e) to ask us to erase personal data without delay:
 - (i) if it is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
 - (ii) if the only legal basis of processing is consent and that consent has been withdrawn and there is no other legal basis on which we can process that personal data;
 - (iii) if you object to our processing where the legal basis is the pursuit of a legitimate interest, or the public interest and we can show no overriding legitimate grounds or interest; and
 - (iv) if the processing is unlawful.
- f) to ask us to rectify inaccurate data or to complete incomplete data;
- g) to restrict processing in specific circumstances e.g. where there is a complaint about accuracy;
- h) to ask us for a copy of the safeguards under which personal data is transferred outside of Nigeria;

- i) the right not to be subject to decisions based solely on automated processing, including profiling, except where such automated decision-making is necessary for entering into, or performing, a contract with U-Law; or it is based on your explicit consent and is subject to appropriate safeguards; or is authorised by law and is also subject to appropriate safeguards;
- j) to prevent processing that is likely to cause damage or distress to you or anyone else;
- k) to data portability;
- l) to be notified of a personal data breach which is likely to result in high risk to their rights and freedoms;
- m) to make a complaint to the Nigerian Data Protection Commission or any other regulatory body; and
- n) in limited circumstances, receive or ask for their personal data to be transferred to a Third Party (e.g., another company which the client has dealings with) in a structured, commonly used, and machine-readable format.

6. Personal Data Protection Principles

When we process your personal data, we are guided by the following principles, which require personal data to be:

- a) processed lawfully, fairly, in a transparent manner, and with respect for the dignity of the human person.
- b) collected only for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- c) adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- d) accurate and, where necessary, kept up to date.
- e) removed or not kept in a form that permits identification of data subject for longer than is necessary for the purposes for which the personal data is processed.

- f) processed in a manner that ensures its security, using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage.

7. User Responsibility

You are required to familiarise yourself with this policy and to ensure that the information you provide to us is complete, accurate, and up to date.

8. Data Security

- 8.1 U-Law implements and maintains appropriate safeguards to protect personal data, taking into account in particular the risks to you, presented by unauthorised or unlawful processing or accidental loss, destruction of, or damage to their personal data.
- 8.2 Safeguarding will include the use of encryption and pseudonymisation where appropriate. It also includes protecting confidentiality (i.e., that only those who need to know and are authorised to use personal data have access to it), integrity, and availability of the personal data. We regularly evaluate and test the effectiveness of those safeguards to ensure the security of our processing of personal data.
- 8.3 You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While we strive to protect the security of your information and constantly review and enhance our information security measures, we cannot guarantee absolute security. U-Law, therefore, accepts no liability for any damage or loss, however caused, in connection with transmission over the internet or electronic storage.

9. Links to third party sites

The U-Law website may contain links to other websites owned and operated by third parties. These links are provided for your information and convenience only and are not an endorsement by U-Law of the content of such linked websites or third parties. The information that we collect from you will become available to these websites if you click the link to the websites. These linked websites are neither under our control nor our responsibility. U-Law, therefore, makes no warranties or representations, express or implied, about the safety of such linked websites, the third parties they are owned and operated by, and the suitability or quality of information contained in them. This Privacy Policy does not apply to these websites, thus, if you decide to access these linked third-party websites

and/or make use of the information contained on them, you do so entirely at your own risk. U-Law accepts no liability for any damage or loss, however caused, in connection with access, the use of, or reliance on any information, material, products, or services contained on or accessed through any such linked websites. We advise that you contact those websites directly for information on their privacy policy, security, data collection, and distribution policies.

10. Third Party Access

10.1 U-Law will only share personal information with other companies, entities, or individuals in the following limited circumstances:

- a) We have your consent.
- b) We provide such information to other professional advisers or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
- c) We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (i) satisfy any applicable law, regulation, legal process or enforceable governmental request, (ii) enforce applicable terms of service, including investigation of potential violations thereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, or (iv) protect against imminent harm to the rights, property or safety of U-Law, its users or the public as required or permitted by law.

10.2 U-Law is, at all times, responsible for the security and appropriate use of that data as long as it remains with U-Law.

11. Violation of Privacy

11.1 We have put in place procedures to deal with any suspected personal data breach and will notify you of any personal data breach and let you know the steps we have taken to remedy the breach and the security measures we have applied to render your personal data unintelligible.

11.2 All suspected breaches of personal data will be remedied without undue delay, and in any event within the timelines required under applicable data protection laws.

11.3 If you know or suspect that a personal data breach has occurred, you should immediately contact the U-Law team at dpteam@uubo.org

11.4 U-Law will not be responsible for any personal data breach that occurs as a result of:

- a) an event which is beyond the control of U-Law;
- b) an act or threat of terrorism;
- c) an act of God (such as, but not limited to fires, explosions, earthquakes, drought, tidal waves, or floods, etc.) which compromises U-Law's data protection measures;
- d) war, hostilities (whether war be declared or not), invasion, acts of foreign enemies, mobilisation, requisition, or embargo;
- e) rebellion, revolution, insurrection, military or usurped power, or civil war which compromises U-Law's data protection measures;
- f) Pandemics or epidemics;
- g) the transfer of your personal data to a third party on your instructions; and
- h) the use of your personal data by a third party designated by you.

12. Data Retention

U-Law shall retain personal data for a period of 10 years from the date of collection or from the date of the conclusion of the relevant engagement or relationship with the Data Subject, as applicable.

13. International Data Transfer

U-Law may transfer personal data to affiliates, service providers, vendors, consultants or other third parties located outside Nigeria where necessary for the provision of our services or the conduct of our business. U-Law will ensure that appropriate safeguards are in place for such transfers in accordance with applicable data protection laws. Where personal data is transferred to a country that does not provide an adequate level of data protection, U-Law will implement appropriate safeguards, which may include standard contractual clauses, binding corporate rules, certification mechanisms or obtaining the consent of the Data Subject. Please contact us for further information regarding the safeguards applicable to any transfer of your personal data outside Nigeria.

14. How to Contact Us

For any enquiries you have in relation to this Privacy Policy, please feel free to contact us at ulawteam@uubo.org