

Privacy Policy

Effective Date: 2024-04-10

INTRODUCTION

Welcome to Smooko Nigeria Limited's Privacy Notice.

Smooko Nigeria Limited ("us", "we" or "our") operates <https://smooko.com.ng> (herein referred to as "**Service**").

Our Privacy Policy governs your visit to <https://smooko.com.ng> (regardless of where you visit it from) and explains how we collect, safeguard and disclose information that results from your use of our Service and tells you about your privacy rights and how the law protects you.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Our Terms and Conditions ("Terms") govern all use of our Service and together with the Privacy Policy constitutes your agreement with us ("Agreement").

DEFINITIONS

Service means the <https://ehledglobal.com/> website operated by Smooko Nigeria Limited Ltd.

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

Usage Data is data collected automatically either generated by the use of Service or from Service infrastructure itself (for example, the duration of a page visit).

Cookies are small files stored on your device (computer or mobile device).

Data Controller means a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be,

processed. For the purpose of this Privacy Policy, we are a Data Controller of your data.

Data Processors (Or Service Providers) means any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

Data Subject is any living individual who is the subject of Personal Data. The User is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

PURPOSE OF THIS PRIVACY NOTICE

This Privacy Policy aims to give you information on how Smooko Nigeria Limited collects and processes your personal data through your use of this website.

This website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

CONTROLLER

Smooko Nigeria Limited is the Controller and responsible for your personal data (collectively referred to as "Smooko Nigeria Limited", "we", "us", or "our" in this Privacy Notice.

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

Contact Details

The details of our DPO are:

Name of legal entity: **Smooko Nigeria Limited**
Name and title of DPO: **Mr Osike Itsagwede, Director**
Email address: osike@ehledglobal.com
Telephone number: **+2348098887923; +447778545358**

You have the right to make a complaint at any time to the National Data Protection Commission Office (NDPC), the Nigerian supervisory authority for data protection issues (<https://www.ndpc.gov.ng/>). We would, however, appreciate the chance to deal with your concerns before you approach the NDPC, so please contact us in the first instance.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

THE DATA WE COLLECT ABOUT YOU

Through your use of this website, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, Country, State, Province, ZIP/Postal code, City
- Cookies and Usage Data

We may use your personal data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link.

Location Data

We may use and store information about your location if you give us permission to do so (“Location Data”). We use this data to provide features of our Service, to improve and customize our Service.

You can enable or disable location services when you use our Service at any time by way of your device settings.

Technical Data

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.

Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service, and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies: We use Session Cookies to operate our Service.
- Preference Cookies: We use Preference Cookies to remember your preferences and various settings.
- Security Cookies: We use Security Cookies for security purposes.
- Advertising Cookies: Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

Usage Data

Includes information about how you use our website.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

While using our Service, we may also collect the following information: sex, age, date of birth, place of birth, passport details, citizenship, registration at place of residence and actual address, telephone number (work, mobile), details of documents on education, qualification, professional training, employment agreements, information on bonuses and compensation, information on marital status, family members, social security (or other taxpayer identification) number, office location and other data.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED

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

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy below for further details.

Third parties or publicly available sources. We may receive Technical Data from analytics providers such as Google.

Usage Data includes information about how you use our website.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your data (a) where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, and (b) where we need to comply with a legal or regulatory obligation.

The types of lawful basis that we will rely on to process your personal data are set out below.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by *contacting us*.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

At Smooko Nigeria Limited, we are committed to protecting your privacy. Set out below is an explanation of how we use information about visitors to this site.

1. We may use your Technical Data to administer and protect our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data. Such use would be necessary for our legitimate interests (for running our business, provision of administration and IT services, to prevent fraud and in the context of a business reorganization exercise), and to comply with a legal obligation.
2. We may use your Usage Data and Technical Data to deliver relevant website content to you and measure or understand the effectiveness of the content. Such use would be necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform market strategy).
3. We may use your Usage Data and Technical Data to use data analytics to improve our website, services, marketing, customer relationships and experiences. Such use would be necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third-party company for marketing purposes. If you give us your express opt-in consent, you can ask us or third parties to stop sending you marketing messages at any time by *contacting us*.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about cookies we use, please see our cookie policy below.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please *contact us*.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURE OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes of how we use your personal data:

1. External Third Parties.
2. Third Parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
3. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

TRANSFER OF DATA

Your information, including Personal Data, may be transferred to - and maintained on - computers located outside of your State, Province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside Nigeria and choose to provide information to us, please note that we transfer the data, including Personal Data, to United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Smooko Nigeria Limited Ltd will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an

organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those of our employees, agents, contractors and other third parties who have a business and need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

DATA RETENTION

How Long Will You Use My Personal Data For?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under the data protection laws in relation to your personal data. Your rights are listed below, and more detail can be found in the glossary below:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please *contact us*.

No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need from You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time Limit to Respond

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

CHANGES TO THIS PRIVACY POLICY

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update “effective date” at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

CONTACT US

If you have any questions about this Privacy Policy, please contact us by email: [***info@smooko.com.ng***](mailto:info@smooko.com.ng)