

Data Protection Policy Statement



INTRODUCTION

At EduTAMS, safeguarding the privacy and security of personal data is central to our operations. We are committed to protecting your data, whether you interact with us as a student, educator, parent, vendor, employee, or partner. We ensure full compliance with applicable data protection laws, including the Nigeria Data Protection Regulation (NDPR).

This policy aims to create a secure environment where users can confidently engage with us, knowing their personal data is handled with the highest care. This document outlines the types of personal information we collect, how it is used, shared, and protected, as well as your rights under applicable data protection laws. By accessing our services via our website, mobile platforms, or other digital channels, you acknowledge and consent to the practices outlined in this policy.

SCOPE

This policy applies to all EduTAMS employees, partners, and any third-party service providers involved in the collection, storage, or processing of personal data. It covers both digital and physical environments where personal data may be handled.

DATA ACCURACY

EduTAMS is committed to ensuring the accuracy of personal data collected, processed, and stored. To achieve this, the following measures will be adopted:

- ❖ **Verification at Collection:** Data accuracy will be confirmed at the point of entry, using reliable sources.
- ❖ **Regular Reviews:** Personal Data will undergo annual reviews, with critical information reviewed quarterly. Corrections will be made within 10 business days of any identified discrepancies.
- ❖ **Self-Service Updates:** A self-service portal will be provided for Data Subjects to review and update their Personal Data.
- ❖ **Audits and Quality Checks:** Bi-annual internal data audits will promptly address inconsistencies.
- ❖ **Third-Party Tools:** Verification systems will be utilized for enhanced data accuracy.

These steps ensure compliance with data protection standards and maintain the integrity of Personal Data.

PERSONAL DATA COLLECTED

We collect personal data only when it is necessary to deliver our services or to fulfil legal obligations. This includes:

- ❖ **Sensitive Personal Data:** Name, contact details, date of birth, and identification documents (passport information or other identification information phone number, email address, postal address, or mobile number), from parents, teachers,
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- ❖ **Biometric Information:** Fingerprints, facial recognition data, etc.
- ❖ **Educational and Employment Data:** Academic records, qualifications, and employment history.
- ❖ **User Activity Data:** Login credentials, IP addresses, usage patterns log, and other data collected through our portal interactions.
- ❖ **Payment Information:** Bank account details, debit card numbers, financial history, and transaction details necessary for processing payments or resolving payment-related issues.
- ❖ **Employee Data:** Collected for recruitment and onboarding purposes.

INTEGRITY AND CONFIDENTIALITY

EduTAMS is dedicated to maintaining strict measures to protect the integrity and confidentiality of personal data, whether stored digitally or physically. These safeguards prevent unauthorized access, data breaches, and alterations, ensuring the accuracy and reliability of the data.

Access to personal data is restricted to authorized personnel whose duties require it. Employees are prohibited from using personal data for personal or commercial purposes and are required to maintain data confidentiality, even after their employment ends. Any data processing beyond an employee's legitimate responsibilities is strictly prohibited.

Upon hiring, the Human Resources Department informs employees of their obligation to protect personal data, which continues even after their employment terminates.

HOW WE USE YOUR DATA

EduTAMS collects and uses data to improve our learning and management solutions, as well as our overall service offerings. The collected data is used for the following purposes

1. **Service Delivery:** To provide, customize, and enhance our learning and management solutions.
2. **User Experience Optimization:** To monitor system performance, ensuring efficient operations.
3. **Client Support:** To deliver prompt customer service and technical assistance based on user feedback and inquiries.
4. **Product Development:** To analyze data for the improvement of existing features and the creation of new solutions.
5. **Compliance and Security:** To meet legal obligations and maintain the integrity and security of our systems and users' data.
6. **Communication:** To keep clients informed about updates, new products, services, and relevant company information.

LEGAL GROUNDS FOR DATA PROCESSING

EduTAMS processes personal data in accordance with the GDPR. Personal data will only be processed under the following circumstances:

- **Consent:** Explicit consent has been provided for data processing. Consent is obtained for each purpose of data collection, and users can update or withdraw their consent at any time. Consent for minors is obtained from their representatives, as required by law.
- **Contractual Obligations:** Processing is necessary to fulfill our contractual obligations.
- **Legal Obligations:** Processing is required to comply with applicable laws and regulations.
- **Vital Interests:** Processing is necessary to protect the vital interests of the data subject or another individual.
- **Public Interest:** Processing is carried out in the public interest or in the exercise of official authority vested in EduTAMS.

DATA STORAGE

EduTAMS follows industry best practices to store data securely, ensuring its confidentiality, integrity, and availability. Our data storage practices include:

1. **Encryption:** Sensitive information is encrypted both in transit and at rest, using advanced encryption protocols (AES, SSH) to prevent unauthorized access.

2. **Secure Servers:** Data is stored on secure servers with strong physical and digital security features such as firewalls and role-based access control (RBAC) ensuring that only authorized personnel can access sensitive data, and monitoring systems.
3. **Database Backups:** Regular backups are performed to ensure data recovery in case of loss or cyber incidents, and these backups are stored securely.
4. **Compliance:** Our data storage practices comply with applicable data protection laws and industry standards to ensure responsible data management.

DATA SECURITY

All employees and third parties handling data are trained and equipped to uphold these security standards. Please note, however, that these protections do not apply to information you choose to share in public areas such as third-party social networks. Where we have provided you (or where you have chosen) with a password that grants you access to specific areas on our site, you are responsible for keeping this password confidential.

It's also important to note that it is your responsibility to maintain the secrecy of any user ID and login password or other authentication details you hold. This will help to ensure that your data is kept secure and confidential.

DATA ACCESS

At EduTAMS, data access is strictly controlled to ensure confidentiality and accuracy. Authorized employees, such as those in technical support, customer service, product development and data analytics, are granted access based on the principle of least privilege. Employees can access data anonymously though have made arrangements, when confidentiality agreements permit them.

Clients access their data through our platform in accordance with their account permissions and settings. This includes administrators or authorized users designated by the client.

All data access is properly monitored and logged to identify any unauthorized activity, and regular audits are conducted to ensure compliance with data protection policies. This process ensures that access is allowed on only for legitimate purposes and maintains strict protection against unauthorized access.

PERSONAL DATA BREACH NOTIFICATION

EduTAMS is committed to notifying relevant authorities, and if necessary, affected individuals, of any personal data breach within 72 hours of becoming aware of the incident. A "Personal Data Breach" is defined as any breach of security that leads to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to personal data, whether accidental or deliberate.

In response to a breach, EduTAMS will undertake the following actions as needed:

- Investigate the breach thoroughly
 - Report it to appropriate regulatory authorities
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- Recover and, if necessary, correct any compromised personal data
- Enhance security controls to prevent recurrence

All EduTAMS employees are required to immediately report any suspected breach of this policy or other data protection regulations to their line manager or the Data Protection Officer (DPO). This includes incidents such as:

- Unauthorized transmission of personal data across borders
- Loss or theft of data or devices
- Accidental sharing of sensitive information with unauthorized persons
- Weak access controls permitting unauthorized access
- Equipment failures compromising data security
- Human errors leading to mishandling of data
- Hacking attempts targeting personal data

Through prompt reporting and swift action, EduTAMS addresses potential risks, protects personal data, and ensures full compliance with regulatory standards. This proactive approach is essential to safeguarding the integrity of our data processes.

RETENTION AND DELETION OF DATA

Personal data will only be retained for as long as necessary to fulfill its purpose or as required by law. Once the retention period expires, or if data is no longer needed, it will be securely deleted, unless required for archiving or legal purposes.

However, To the extent permitted by applicable laws and without prejudice to EduTAMS 's Retention Policy, the length of storage of Personal Data shall, amongst other things, be determined by:

- a. The contract terms agreed between EduTAMS and the Data Subject or as long as it is needed for the purpose for which it was obtained; or
- b. Whether the transaction or relationship has statutory implication or a required retention period; or
- c. an express request for deletion by the Data Subject; except where such Data Subject is under an investigation or under a subsisting contract which may require further processing or where the data relates to criminal records; or
- d. whether EduTAMS has another lawful basis for retaining that information beyond the period for which it is necessary to serve the original purpose.

If you wish to exercise your right to request the deletion of your personal data, you can contact our data protection officer - coo@edutams.net / enquiry@edutams.net. We will consider your request carefully and will provide you with a clear and concise explanation of any circumstances where your request may be denied.

YOUR RIGHTS

In compliance with our data protection obligations as a controller, EduTAMS LIMITED wishes to inform you as a data subject and customer, on your rights over your personal information. Our policy provides the following rights and a clear process to help you exercise them:

- ❖ **Right to Be Informed:** We respect your right to know how your personal data is processed especially for marketing purposes. In this case, information on data processing within our organization is disclosed in this privacy policy to make it fair.
 - ❖ **Right to Access:** You have the right to access the personal data that we hold about you for a charge that is reasonable, albeit you may be refused access in some circumstances authorized by the law. The industrial requests must be rational, and therefore, may attract a service charge. OPYN If structured data is held electronically you can request it in a specified electronic form.
 - ❖ **Right to Erasure:** You may also ask for your personal data to be erased or to cease to be processed where there is no other legitimate reason for continuing to process that data. That is why EduTAMS will respect this right and act based on it.
 - ❖ **Right to Data Portability:** You can ask EduTAMS to transfer your personal data to another organization or directly to you as per certain provisions. Here, we make it possible that your data is migrated, replicated or transferred between IT systems without altering its functionality.
 - ❖ **Right to Rectification:** The Overall, each individual is permitted to request a notification in writings by the controller to rectify any data that is inaccurate or incomplete.
 - ❖ **Right to Restrict Processing:** In some situations, you have the right to demand limitation on the processing of your data.
 - ❖ **Right to Object:** You also have the right to spare to processing of your data, and to withdraw your consent at any time.
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EduTAMS has provided structures through which you may wish to exercise these rights. Kindly contact us with your request, and we guarantee that we shall reply within the expected working days. You are an important client to us and your rights, and data privacy are valued.

THIRD-PARTY DATA SHARING

We only share data with trusted third-party service providers who assist us in delivering our services, such as cloud hosting providers, payment processors, or analytics services. These providers are bound by strict confidentiality agreements and data protection standards, ensuring they handle data securely and in compliance with applicable laws. Where data is transferred to countries outside Nigeria, we ensure that appropriate safeguards are in place to protect your privacy.

DATA TRANSFER

Our Data Transfer Policy is designed to ensure that your data is handled with the utmost care and securely transferred, whether within our systems or to trusted third parties, domestically and internationally between all the. This is guided by the following principles in line with NDPR.

1. **Secure Transfer Protocols:** All data transfers, whether internal or external, are conducted using secure transfer protocols such as HTTPS, SFTP, or encrypted email. These protocols ensure that data is encrypted during transit, protecting it from interception or unauthorized access.
 2. **Provisioning:** When data is transferred to third-party data processors, we ensure that these processors adhere to strict data protection standards. We use reasonable diligence to ensure that their security measures meet our
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policies and comply with applicable laws. Data Transfer Agreements or Data Processing Agreements (DPAs) are structured to formalize these requirements.

3. Cross-border transfers: If data needs to be transferred across borders, we ensure compliance with relevant data protection laws (NDPR), this may require additional safeguards such as standard contract clauses (SCCs). or relying on internationally agreed procedures.
4. Data Minimization: Only the minimum amount of data needed for the intended purpose is transferred. We avoid transferring sensitive or personal information unless absolutely necessary and ensure that whenever possible such information is not anonymized or pseudonymized.
5. Access control during transfer: Access to data during transfer is restricted to authorized personnel only. Multifactor authentication and role-based access control are used to prevent unauthorized access.

POLICY UPDATES

This policy will be reviewed regularly and updated to ensure compliance with evolving legal requirements and best practices. Any significant changes will be communicated to stakeholders in a timely manner.

PRIVACY CONTACT INFORMATION

If you have any questions, concerns, or comments about our privacy policy, you may contact our Data Protection Officer. Kindly address your request to “The Data Protection Officer” at *Plot 5,Block VIII, Off Conference Hotel Avenue,GRA, Ijebu-Ode, Ogun State, Nigeria* or via email

Email us at: enquiry@edutams.net/ coo@edutams.net

Call us: +234 (0) 805 868 4616 , +234(0) 903 985 5429

GLOSSARY

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

“Database” means a collection of data organized in a manner that allows access, retrieval, deletion, and processing of that data; it includes but is not limited to structured, unstructured, cached, and file system-type Databases.

“Data Processor means a person or organization that processes Personal Data on behalf and on instructions of EduTAMS.

“Data Subject” means any person, who can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

“NDPR” means the Nigerian Data Protection Regulation, 2019.

“Personal Data” refers to any information linked to an identified or identifiable individual ('Data Subject'). An identifiable individual is one who can be recognized, directly or indirectly, through identifiers such as a name, identification number, location data, or an online identifier. This also includes factors related to the individual's physical, physiological, genetic, mental, economic, cultural, or social identity. Personal Data may encompass a range of information including names, addresses, photographs, email addresses, bank details, social media posts, medical records, and other unique identifiers such as MAC address, IP address, IMEI number, IMSI number, SIM, and other forms of Personal Identifiable Information (PII).

“Sensitive Personal Data” means data relating to religious or other beliefs, sexual orientation, health, race, ethnicity, political views, trades union membership, criminal records or any other sensitive personal information.