

# DATA PRIVACY POLICY

Whiteridge Limited is committed to protecting the privacy and personal data of individuals who interact with our website, services, and engagements. This Data Privacy Policy explains how we collect, use, store, and protect personal data in compliance with applicable data protection laws.

## 1. Scope of This Policy

This Policy applies to personal data collected through:

- Our website and digital platforms
- Client engagements and service delivery
- Training programmes, recruitment, and capacity development
- Communications with stakeholders and partners

## 2. Legal Basis for Processing

We process personal data in accordance with the **Nigeria Data Protection Act**

**(NDPA) 2023**, based on one or more of the following legal grounds:

- Consent of the data subject
- Performance of a contract or pre-contractual obligations
- Compliance with legal or regulatory obligations
- Legitimate interests, provided such interests do not override individual rights

## 3. Types of Personal Data We Collect

Depending on the nature of interaction, we may collect:

- Identification data (name, job title, organization)
- Contact information (email address, phone number)
- Professional and employment-related information
- Training and recruitment information
- Technical data (IP address, browser type, access logs)

Whiteridge does **not intentionally collect sensitive personal data** unless required by law or expressly consented to by the data subject.

## 4. Purpose of Data Collection

We collect and process personal data for the following purposes:

- Provision of intelligence, security, and advisory services
- Client communication and relationship management
- Training delivery and capacity development
- Recruitment and human resource processes
- Legal, regulatory, and compliance obligations

## 5. Data Sharing & Disclosure

We do not sell or rent personal data. Personal data may be shared only:

- With trusted service providers under confidentiality obligations

- Where required by law or regulatory authorities
- With client consent or contractual authorization

## **6. Data Security**

Whiteridge implements **appropriate technical and organizational measures** to protect personal data against unauthorized access, loss, misuse, or disclosure. Access to personal data is restricted to authorized personnel only.

## **7. Data Retention**

Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected, or as required by law, contractual obligations, or regulatory requirements.

## **8. Data Subject Rights**

In accordance with applicable data protection laws, individuals have the right to:

- Access their personal data
- Request correction or update of inaccurate data
- Request deletion or restriction of processing
- Withdraw consent where processing is based on consent
- Lodge a complaint with the relevant data protection authority

Requests may be submitted using the contact details below.

## **9. Cookies & Website Analytics**

Our website may use cookies and similar technologies to enhance user experience and analyze website traffic. Users may manage cookie preferences through their browser settings.

## **10. International Data Transfers**

Where personal data is transferred outside Nigeria, Whiteridge ensures appropriate safeguards are in place in accordance with applicable data protection laws.

## **11. Changes to This Policy**

Whiteridge reserves the right to update this Data Privacy Policy at any time. Updates will be posted on our website with the revised effective date.

## **12. Contact Information**

For questions, requests, or concerns regarding this Data Privacy Policy, please contact:

### **Whiteridge Limited**

Email: [privacy@whiteridge.ng](mailto:privacy@whiteridge.ng)

Website: [www.whiteridge.ng](http://www.whiteridge.ng)

## **Compliance Statement**

Whiteridge Limited is committed to handling personal data lawfully, ethically, and securely, in line with national regulations and international best practices.