[*Company Logo*]

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| PRIVACY NOTICE FOR EMPLOYEES |

**DOCUMENT CONTROL**

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**REVISION HISTORY**

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**PRIVACY NOTICE FOR EMPLOYEES**

1. **INTRODUCTION**

[Name of Company] takes the privacy of all employees seriously and is committed to protecting the privacy and security of your Personal Data under the legislation of the Nigeria Data Protection Regulation (NDPR).

This privacy notice outlines the types of Personal Data that we hold about you as an Employee of [Name of Company]. It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are aware of how and why we are using such Personal Data, with whom we may share it, how long we keep it for and other relevant information which is your Personal Data.

1. **HOW DO WE GET YOUR INFORMATION?**

[Name of Company] collects Personal Data about you in a variety of ways and from the following sources:

* Directly from you
* From notes made during a recruitment interview
* From a recruitment agency
* Former employers when gathering references
* [*From background check and investigation*]
* Other third-parties like [Health providers, Pension administrators etc.]

1. **THE TYPE OF INFORMATION WE HOLD ABOUT YOU**

The Personal Data we collect, store, and use about you (directly from you or from public or third party information sources) include; [name, address, date of birth, gender, marital status, bank account details, payroll records, compensation history, other human capital development information, tax and pension information, and sensitive personal information such as biometric, criminal records, religion, health records, etc.]

1. **WHY WE PROCESS YOUR PERSONAL DATA**

We will only use your Personal Data for different purposes and when the law allows us to or in the following circumstances:

* Where it is necessary for performing a contract, we have entered into with you.
* Where we need to comply with a legal obligation.
* Where we have a legitimate interest pursued by us or by a third party.
* Where it is in your vital interest.
* Where it is in the interest of the public; or for official purposes; or in furtherance of national security or investigation.

1. **SHARING YOUR PERSONAL DATA**

[Name of Company] will share your Personal Data with other employees within the organisation where it is necessary for them to undertake their duties. These include for example, your line manager for their management of you as an employee, the HR department for maintaining personnel records and the Finance department for administering payment under your contract of employment.

When we disclose your Personal Data to third parties, we only disclose to them Personal Data that is necessary for them to provide services. We have contracts in place with these third parties in receipt of your Personal Data, requiring them to keep your Personal Data secure and not to use it other than in accordance with our specific instructions and requirements of the Nigeria Data Protection Regulation (NDPR).

1. **SECURITY AND SAFEGUARDS**

[Name of Company] will take reasonable precautions to protect Personal Data in its possession and secure against the risk of loss, misuse, unauthorized access, disclosure, alteration, and destruction. [Name of Company] periodically reviews its security measures in an effort to ensure the privacy of Personal Data and will take reasonable precautions to ensure Personal Data is used only in ways that are compatible with the purposes for which the data was collected or subsequently authorized by the Data Subject. While [Name of Company] will take reasonable steps to ensure that Personal Data is relevant to its intended use, accurate, complete, and current, [Name of Company] also relies upon you to assist in providing accurate updates of your Personal Data.

1. **RETENTION**

In line with the NDPR and other statutory regulatory demands, [Name of Company] only keeps your Personal Data for as long as necessary to fulfil the purposes we collected it for, which will be at least for the duration of your employment with us.

In some cases, we will keep your Personal Data for a period after your employment has ended. Retention periods can vary depending on why we need your Personal Data.

Details of retention periods for different aspects of your Personal Data are available in our Retention Schedule. 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.

1. **YOUR RIGHTS AS A DATA SUBJECT**

[Name of Company] understands the NDPR that gives you certain rights in relation to the Personal Data we hold about you. These are:

* **the right to be informed:** This means that we must tell you how we use your Personal Data, and that is the purpose of this Privacy Notice.
* **the right of access:** You have the right to access the Personal Data that we hold about you. To do so, you can make an access request.
* **the right for any inaccuracies to be corrected:** If any Personal Data that we hold about you is incomplete or inaccurate, you can require us to correct it.
* **the right to have your Personal Data deleted:** If you would like us to stop processing your Personal Data, you have the right to ask us to delete it from our systems where there is no reason for us to continue processing it.
* **the right to restrict the processing:** If you believe the Personal Data we hold is incorrect, you have the right to stop processing the Personal Data (whilst still holding it) until we have ensured that the Personal Data is correct.
* **the right to portability:** You may transfer the Personal Data that we hold about you for your own purposes.
* **the right to regulate any automated decision-making and profiling of Personal Data:** You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

Where you have provided consent to our use of your Personal Data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing your Personal Data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use your Personal Data where so permitted by having a legitimate reason for doing so.

1. **BREACH/ PRIVACY VIOLATION**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data, we shall within 72 (Seventy-Two) hours of having knowledge of such breach report the details of the breach to NITDA.

Furthermore, where we ascertain that such breach is detrimental to your rights and freedoms in relation to your Personal Data, we shall within 7 (Seven) days of having knowledge of the occurrence of such breach take steps to inform you of the breach incident, the risk to your rights and freedoms resulting from such breach and any course of action to remedy said breach.

1. **QUESTIONS OR CONCERNS**

If you have any questions or wish to exercise any of your rights explained, please contact our Human Resource Department or Data Protection Officer.

[*insert contact details*]

You have a right to complain to the Regulatory Authority if you think that your information has been misused. The contact details are:

*National Information Technology Development Agency*

Tel: *+234929220263, +2348168401851, +2347052420189*

Email Address**:** *info@nitda.gov.ng*

1. **CHANGES TO THIS NOTICE**

[Name of Company] reserves the right to modify this Notice from time to time in order that it accurately reflects the regulatory requirements of the NDPR.

When changes are made to this Notice, [Name of Company] will update and notify employees about the processing of Personal Data.

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| **DECLARATION**  I \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ acknowledge that I received and read [*Name of Company*] Privacy Notice for Employees. I hereby agree to [*Name of Company*] to use and process my Personal Data relating to my employment in line with this Privacy Notice.  Name of Employee:  Position:  Signature:  Date: |