

Privacy and Confidentiality Guidelines

JAK Technologies

1. Introduction: JAK Technologies is dedicated to safeguarding the privacy and confidentiality of our clients' and tenants' information in Nigeria. These guidelines establish our commitment to handling personal and sensitive information in compliance with Nigerian data protection laws and regulations.
2. Scope: These guidelines apply to all employees, contractors, and third-party service providers who access personal and sensitive information while performing duties for Jak Technologies in Nigeria.
3. Definitions:
 - a. Personal Information: Any data that identifies or can be used to identify an individual, including but not limited to names, addresses, contact details, and financial information.
 - b. Sensitive Information: Personal data that necessitates special protection due to its sensitive nature, such as health records, financial accounts, and government-issued identifiers.
4. Data Collection and Use: We collect personal information from tenants and clients in Nigeria only for legitimate purposes and in compliance with the Nigerian Data Protection Regulation (NDPR), obtaining consent where required.
 - Personal information is utilized solely for the provision of services to our clients and tenants, property management, and enhancing the tenant experience.
 - We do not engage in the sale or rental of personal information to third parties for marketing purposes without explicit consent.
5. Security Measures: We maintain robust technical and organizational measures to safeguard personal and sensitive information against unauthorized access, disclosure, alteration, and destruction, in accordance with NDPR requirements. Access to personal and sensitive information is restricted to authorized personnel with a legitimate business need, and stringent access controls and monitoring mechanisms are enforced in Nigeria.
6. Third-Party Relationships:
 - We may enlist the services of third-party providers in Nigeria to assist in property management and service provision to our clients and tenants.



- Third-party providers are contractually bound to adhere to our privacy and confidentiality standards, and are prohibited from utilizing personal information for purposes other than those explicitly authorized by IRIKO and in compliance with NDPR.

7. Consent and Permissions:

- By furnishing personal information to IRIKO clients and tenants in Nigeria consent to the collection, use, and disclosure of their information as delineated in these guidelines and any applicable privacy notices.
- Clients and tenants retain the right to withdraw consent or modify their preferences regarding the use of their personal information at any time, as provided for under NDPR.

8. Data Retention and Deletion:

- Personal information is retained only for as long as necessary to fulfill the purposes for which it was collected or as mandated by NDPR requirements in Nigeria.
- Disposal of personal information that is no longer required is carried out securely, preventing unauthorized access or disclosure, in compliance with NDPR provisions.

9. Compliance and Enforcement:

- Adherence to these guidelines is mandatory for all employees, contractors, and third-party service providers in Nigeria.
- Non-compliance with these guidelines may result in disciplinary action, including termination of employment or contract, and legal recourse if warranted, in accordance with NDPR.

10. Updates and Amendments:

- These guidelines will be subject to periodic review and updates to reflect advancements in technology, alterations to regulations, or changes in business practices in Nigeria.
- Any amendments to these guidelines will be communicated to relevant stakeholders in Nigeria and implemented promptly.

11. Legal Compliance: These guidelines are formulated to align with the Nigerian Data Protection Regulation (NDPR) and other relevant data protection laws and regulations applicable in Nigeria.

12. Acknowledgement: We hereby acknowledge receipt and review of the "Privacy and Confidentiality Guidelines" established by JAK Technologies. These guidelines underscore the company's dedication to upholding the privacy and confidentiality of clients' and tenants' information in Nigeria, ensuring compliance with Nigerian data protection laws and regulations. By accepting these guidelines, we affirm our commitment to adhering to the outlined principles and procedures regarding the collection, use, and protection



of personal and sensitive information. We understand that compliance with these guidelines is mandatory for all employees, contractors, and third-party service providers operating within Nigeria under the purview of JAK Technologies.

Furthermore, we recognize our responsibility to maintain the security of personal and sensitive information, uphold consent and permission standards, and ensure proper data retention and deletion practices in accordance with Nigerian Data Protection Regulation (NDPR) requirements.

We acknowledge that any amendments or updates to these guidelines will be communicated promptly, and we commit to staying informed and compliant with the latest revisions.

Signed:

Asomugha John kenenna

Managing Director

3/18/2024

