

## 1. **INTRODUCTION**

The IMEDU SAPELE CDA (Community Development Association) is committed to protecting the privacy of its members' and stakeholders' personal data. This Data Privacy Protection Policy outlines our practices regarding the collection, processing, storage, and disposal of personal information, in compliance with relevant Nigerian laws and regulations.

## 2. **Scope**

This policy applies to all personal data collected and processed by IMEDU SAPELE CDA, regardless of how it is collected or stored. It covers all individuals whose data is processed by the CDA, including members, residents, contractors, and any other stakeholders.

## 3. **Guiding Principles**

Our data privacy practices are guided by the following principles:

- **Lawfulness, Fairness, and Transparency:** We process personal data lawfully, fairly, and in a transparent manner.
- **Purpose Limitation:** We collect personal data for specified, explicit, and legitimate purposes and do not further process it in a manner that is incompatible with those purposes.
- **Data Minimization:** We collect only adequate, relevant, and limited personal data necessary for the purposes for which it is processed.
- **Accuracy:** We take reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date.
- **Storage Limitation:** We keep personal data in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- **Integrity and Confidentiality:** We process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.

- **Accountability:** We are responsible for, and are able to demonstrate compliance with, these principles.

#### 4. ***Legal Basis for Processing***

IMEDU SAPELE CDA processes personal data in accordance with the provisions of the **Nigerian Data Protection Act (NDPA) 2023**. Our legal bases for processing may include:

- **Consent:** Where the data subject has given explicit consent for the processing of their personal data for one or more specific purposes.
- **Contractual Necessity:** Where processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract.
- **Legal Obligation:** Where processing is necessary for compliance with a legal obligation to which the CDA is subject.
- **Legitimate Interests:** Where processing is necessary for the purposes of the legitimate interests pursued by the CDA or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

#### 5. ***Relevant Authorities***

IMEDU SAPELE CDA acknowledges and will comply with the directives and guidelines of the following relevant authorities in Nigeria concerning data privacy:

- **Nigerian Data Protection Commission (NDPC):** The primary regulatory body established under the NDPA 2023, responsible for regulating data protection in Nigeria.
- **Lagos State Real Estate Regulatory Authority (LASRERA):** While not a primary data protection authority, LASRERA's regulations for real estate transactions in Lagos State may involve the collection and processing of personal data. IMEDU SAPELE CDA will ensure its data practices align with LASRERA's requirements where applicable to real estate-related activities within the community.

- **Lagos State Residents Registration Agency (LASRRA):** LASRRA is responsible for the registration of all residents in Lagos State and the issuance of residency cards. As a CDA operating within Lagos State, IMEDU SAPELE CDA may interact with LASRRA's database or processes, and will ensure compliance with any data-sharing or data processing requirements related to LASRRA's mandate.

## 6. *Types of Personal Data Collected*

The types of personal data we may collect include, but are not limited to:

- **Identification data:** Names, addresses, contact details (phone numbers, email addresses), resident title (landlord or tenant), house number, apartment number, streets name, gender, religion, civic status, type of structure, number of dependants, occupation, nationality, ethnicity, family living outside the community (name, where, whatsapp number), number of apartment/s in the same compound, moved-in-date and photographs.
- **Property data:** Details related to property ownership or residency within the Imedu Sapele community.
- **Other data:** Any other information voluntarily provided by members or stakeholders relevant to CDA's operations and administration.

## 7. *How Personal Data is Collected*

Personal data may be collected through various means, including:

- Membership registration forms.
- Community surveys or feedback forms.
- Direct communication (email, phone, in-person meetings).
- Event registration.
- Voluntary submissions.

## 8. *Use of Personal Data*

Personal data collected by IMEDU SAPELE CDA will be used for the following purposes:

- Membership management and communication.
- Facilitating community development initiatives and projects.
- Organizing community events and meetings.
- Disseminating important information and updates to members.
- Managing financial contributions and expenditures related to CDA activities.
- Compliance with legal and regulatory requirements.
- Maintaining community safety and security.

## 9. ***Disclosure of Personal Data***

IMEDU SAPELE CDA will not disclose personal data to third parties unless:

- The data subject has given explicit consent.
- Required by law or a court order.
- Necessary for the performance of a contract (e.g., engaging contractors for community projects, who may require limited personal data for access or communication).
- It is to a relevant authority as outlined in Section 5, and in compliance with their respective guidelines.

When personal data is shared with third parties, we will ensure that adequate data protection safeguards are in place.

## 10. ***Data Security***

IMEDU SAPELE CDA is committed to protecting personal data from unauthorized access, alteration, disclosure, or destruction. We implement appropriate technical and organizational measures to ensure the security of personal data, including:

- **Access Controls:** Restricting access to personal data to authorized personnel only.
- **Physical Security:** Securing physical documents and storage devices.
- **Digital Security:** Utilizing password protection, encryption, and other cybersecurity measures for electronic data.

- **Regular Training:** Providing data privacy awareness training to relevant CDA officials and volunteers.

## 11. *Data Retention*

Personal data will be retained for no longer than is necessary for the purposes for which it was collected, or as required by law. Once personal data is no longer required, it will be securely disposed of.

## 12. *Data Subject Rights*

In accordance with the NDPA 2023, data subjects have the following rights regarding their personal data:

- **Right to Information:** The right to be informed about the collection and use of their personal data.
- **Right of Access:** The right to obtain confirmation as to whether or not personal data concerning them is being processed, and, where that is the case, access to the personal data.
- **Right to Rectification:** The right to request the correction of inaccurate personal data.
- **Right to Erasure (Right to be Forgotten):** The right to request the deletion of their personal data under certain circumstances.
- **Right to Restrict Processing:** The right to request the restriction of processing of their personal data under certain circumstances.
- **Right to Data Portability:** The right to receive personal data concerning them in a structured, commonly used, and machine-readable format and to transmit that data to another controller.
- **Right to Object:** The right to object to the processing of their personal data under certain circumstances.
- **Rights in Relation to Automated Decision Making and Profiling:** The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them.

To exercise any of these rights, data subjects should contact the IMEDU SAPELE CDA Data Protection Officer (or designated contact person) as outlined in Section 14.

### **13. *Breach Notification***

In the event of a personal data breach that is likely to result in a high risk to the rights and freedoms of data subjects, IMEDU SAPELE CDA will notify the affected data subjects and the Nigerian Data Protection Commission without undue delay, and where feasible, not later than 72 hours after becoming aware of it, in accordance with the NDPA 2023.

### **14. *Contact Information***

For any questions, concerns, or requests regarding this Data Privacy Protection Policy or the processing of personal data by IMEDU SAPELE CDA, please contact:

**[JAPHET OLUWALABOMI/DATA ENGINEER/DEVELOPER]  
[REVENUE CHAIRMAN]  
[revenue.imscda@gmail.com]  
[08141200023]**

### **15. *Policy Review***

This policy will be reviewed periodically, at least once a year, or as required by changes in relevant laws, regulations, or CDA operations, to ensure its continued effectiveness and compliance.

**Date of Last Review:** [14th of July 2025]

**Date of Next Review:** 000000]