# **Whitefield Foundation Privacy Policy**

# (Last updated November 2021)

Thank you for choosing to interact with, support, partner or otherwise collaborate with Incorporated Trustees of Whitefield Foundation, a non-governmental organisation generally known as Whitefield Foundation(“Whitefield”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at compliance@whitefieldfoundation.ng.

When you visit our website http://whitefieldfoundation.ng and interact with any of our events, platforms or programs, you trust us with your personal information (“Platforms”). We take your privacy very seriously. In this privacy policy, we explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. It is important so we hope you take some time to read through it carefully. If there are any terms in this privacy policy that you do not agree with, please discontinue use of all of our Platforms.

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

*In Short: We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us on any of our Platforms, in expressing an interest in obtaining information about us or what we do, when participating in activities (such as posting messages in our online forums or registration for programs and entering competitions) or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the choices you make and the products and features you use. The personal information we collect can include the following:

Publicly Available Personal Information: We collect first name, maiden name, last name, and nickname; current and former address; phone numbers; email addresses; business email; business phone number; and other similar data.

Testimonials: We collect videos, pictures, text and any other information shared with us in the process of going through any of our programs or provided afterwards (“Testimonials”). By accepting this privacy policy you recognise that these are essential for us to run this NGO and give us an irrevocable, non-exclusive right to use and share these testimonials on our Platforms and with our partners.

Financial Data: We collect data necessary to process any payment we make to you (such as grants) or that you make to us (such as donation). These may include your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data collected is stored securely.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

2. HOW DO WE USE YOUR INFORMATION?

*In Short: We process your information for purposes based on legitimate business interests, to provide relief and services to you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our platforms for a variety of purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

To keep records of the relief and support we provide. As a NGO, we receive funding support and need to report on our use of the funds. We may use your information in such records or reports.

To deliver services to the user. We may use your information to provide you with the requested service.

To respond to user inquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our platforms..

For other Business Purposes. We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

*In Short: We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations.*

We may process or share data based on the following legal basis:

* Consent: We may process your data if you have given us specific consent to use your personal information in a specific purpose.
* Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.
* Performance of a Contract: Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
* Legal Obligations: We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
* Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

* Partners: We may share your information with our partners and sponsors or our charitable initiative. They may, in some instances, offer you certain products, services or promotions through the information shared.
* Vendors, Consultants and Other Third-Party Service Providers: We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Platforms, which will enable them to collect data about how you interact with the Platforms over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
* Business Transfers: We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
* Third-Party Advertisers: We may use third-party advertising companies to serve ads when you visit the Platforms. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

*In Short: Yes, we may.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Some cookies are necessary to run the platform. For all optional cookies, you will have the option to give or withhold consent for us to access or store information through those cookies.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

*In Short: We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.*

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing business need to process your personal information, we will delete or anonymize it, or if not possible, we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

*In Short: We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Platforms is at your own risk. You should only access the services within a secure environment.

7. DO WE COLLECT INFORMATION FROM MINORS?

*In Short: We do not knowingly collect data from or market to children under 18 years of age.*

We do not knowingly solicit data from or market to children under 18 years of age. By using the Platforms, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependant’s use of the Platforms. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at compliance@whitefieldfoundation.ng.

8. WHAT ARE YOUR PRIVACY RIGHTS?

*In Short: You may review, change, or terminate your account at any time.*

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: <http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm>.

If you have questions or comments about your privacy rights, you may email us at compliance@whitefieldfoundation.ng.

Updating or Deleting Your Information

If you would at any time like to review or change the information stored with us, you can contact us using the contact information provided.

Upon your request, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, and/or comply with legal requirements.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Platforms. To opt-out of interest-based advertising by advertisers on our Platforms visit <http://www.aboutads.info/choices/>.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account. To otherwise opt-out, you may:

Contact us using the contact information provided.

9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

10. DO WE MAKE UPDATES TO THIS POLICY?

*In Short: Yes, we will update this policy as necessary to stay compliant with relevant laws.*

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

11. HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may email us at compliance@whitefieldfoundation.ng. or by post to:

**Whitefield Foundation**

**Capstone Resource Centre,**

**25 McEwen Street,**

**off Herbert Macaulay Street,**

**Sabo-Alagomeji,**

**Yaba, Lagos State,**

**Nigeria.**

**Attn: Compliance Unit**

12. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the laws of some countries, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please send an email with full details of your request to [compliance@whitefieldfoundation.ng](mailto:compliance@whitefieldfoundation.ng).

We will respond to your request within 30 days.