

## Tongston Group Privacy Notice

We at Tongston Group, including our relevant affiliate entities, respect your concerns about privacy.

For the purposes of this Notice, Tongston Group comprises of the Holdings Company, Tongston Entrepreneurship Holdings ("Tongston Holdings") and the 4 subsidiary companies: Tongston Entrepreneurship College ("Tongston College"), Tongston Entrepreneurial Teachers Hub trading as Tongston Entrepreneurship Institute ("Tongston Institute"), Tongston Entrepreneurship Media ("Tongston Media") and Tongston Entrepreneurship Ventures ("Tongston Ventures").

This Privacy Notice describes how we process the Personal Data:

- that we collect on <http://www.tongston.com>, [www.tongstoninstitute.com](http://www.tongstoninstitute.com), [www.tongstoncollege.com](http://www.tongstoncollege.com), [www.tongstonmedia.com](http://www.tongstonmedia.com), [www.tongstonventures.com](http://www.tongstonventures.com) that are accessible through [www.tongston.com](http://www.tongston.com) other websites or applications that may link to this Privacy Notice (the "Sites");
- where you visit our premises, centres, or affiliate centres;
- where you submit any documentation to access our products and services;
- where you share information to subscribe to our newsletter;
- where you share information in attending our events;
- where you are a contact at one of our suppliers or other business partners; and
- through other data collection points or notices that reference this Privacy Notice.

We provide information on the types of Personal Data we collect, how we use the information, with whom we may share it and the choices available to you regarding our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices.

"Personal Data" is any information that relates to, describes, identifies or can be used, directly or indirectly, to identify an individual, such as name, address, date of birth, personal identification numbers, sensitive personal information, and economic information).

### Key Terms

In this Notice, these terms have the following meanings:

"Affiliate" means an entity that directly or indirectly Controls, is Controlled by or is under common Control with an entity.

"Contact" is a person a Member may contact through our Service. In other words, a Contact is anyone on a Member's Distribution List about whom a Member has given us information or is anyone who has otherwise interacted with a Member via the Service. For example, if you are a Member, a Client, a subscriber to your email marketing campaigns or a shopper to your Website or Landing Page would be considered a Contact.

"Control" means an ownership, voting or similar interest representing fifty percent (50%) or more of the total interests then outstanding of the entity in question. The term "Controlled" shall be construed accordingly.

"Distribution List" is a list of Contacts a Member may upload or manage on our platform and all associated information related to those Contacts (for example, email addresses).

"Member" means any person or entity that is registered with us to use the Service.

"Mobile App(s)" means any one or all of the Tongston applications available for Members to use on their mobile devices.

"Personal Information" means any information that identifies or can be used to identify an individual directly or indirectly. Examples of Personal Information include, but are not limited to, first and last name, date of birth, email address, gender, occupation, or other demographic information.

"Service" is any access to any product or service.

"Visitor" means, depending on the context, any person who visits any of our Mailchimp Sites, offices, or otherwise engages with us at our events or in connection with our marketing or recruitment activities.

"you" and "your" means, depending on the context, either a Member, a Contact, or a Visitor.

Click on one of the links below to jump to the listed section:

## **Information We Obtain**

Information that you give us

The types of information we collect concerning individuals includes:

1. business and personal contact information (such as name, postal and email addresses, and telephone number);
2. other information you provide to us (such as information provided by registering for email alerts, filling in forms, and online registration details);
3. information we need in order to identify you and complete necessary security and safety checks, where you visit one of our buildings (such as a form of ID, and your image for closed-circuit television (CCTV) purposes);
4. information about the device and applications you use to access the Service, such as your IP address, your operating system, your browser ID, viewfinder size, and other information about your system and connection. If you are using our Mobile App that we create, we may also collect information about the cellular network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's name and unique device ID, and information about the features of our Mobile App that you accessed;
5. Information on the log files from web servers that record data each time a device accesses those servers and the nature of each access, including originating IP addresses and your activity in the Service (such as the date/time stamps associated with your usage, pages and files viewed, searches and other actions you take (for example, which features you used)), device event information (such as system activity, error reports (sometimes called 'crash dumps')), and hardware settings. We may also access metadata and other information associated with files that you upload into our Service;

6. usage data about you whenever you interact with our Service, which may include the dates and times you access the Service and your browsing activities (such as what portions of the Service you used, session duration, links clicked, non-sensitive text entered, and mouse movements). We also collect information regarding the performance of the Service, including metrics related to the deliverability of emails and other communications you send through the Service. If you are using any Mobile App to be created, we may collect information about how often you use the Mobile App and other performance data. This information allows us to improve the content and operation of the Service, and facilitate research and analysis of the Service.

In connection with a job inquiry or application on our careers page or on any third party google docs forms, you may provide: login credentials, information regarding your work authorization status, education history, current or past job/employment history and professional designations, answers to competency based questions, location, social media handles, state of origin, nationality, CV, references, performance evaluations; and other information about your background, competencies and qualifications.

In addition, where legally permissible, you may provide information regarding your gender, age, marital status, religion, national origin, citizenship status, race/ethnicity, and your and disability status. Blackstone will not consider either this information or your choice to decline to provide it in evaluating your qualifications for employment with us. This information will be used only for Equal Employment Opportunity tracking and other legal and compliance purposes as per our staff handbook.

In some cases, you will have previously provided your personal information to Tongston (if, for example, you are a former employee, intern, consultant or otherwise). If you choose to register or login to a Tongston web site using a third party single sign-in service that authenticates your identity and connects your social media login information (e.g. LinkedIn, Google, or Twitter) with Tongston, we will collect any information or content needed for the registration or log-in that you have permitted the social media provider to share with us, such as your name and email address.

In some cases, the personal data that we collect will also include special categories of data, such as diversity related information (including data about racial and ethnic origin, political opinions, religious beliefs and other beliefs of a similar nature, trade union membership and data about sexual life and sexual orientation), or health data and data about alleged or proven criminal offenses, in each case, where permitted by law.

Depending on the nature of our relationship with you, in the past, we may have collected Personal Data concerning you in the following categories:

- Identifiers (e.g., real name, postal address, email address, government ID, financial information);
- Sensitive/protected characteristic information (e.g., age, race, citizenship, gender);
- Commercial information (e.g., products or services purchased, obtained, or considered, personal information disclosed in a sale or acquisition process);
- Internet or other network activity (e.g. browsing or search history, information regarding interaction with an internet website, application, or advertisement);
- Geolocation data (e.g. physical location);
- Professional or employment-related information (e.g. job history, performance evaluations);

- Non-public education information (e.g. education records); and
- Inferences drawn from other personal information (e.g. profiles reflecting preferences and trends).

Other information:

In connection with electronic interactions you have with us or our service providers (including by email, phone or other forms of electronic communication), we may record and monitor details of those interactions, including their content, to the extent permitted or required by applicable law.

In connection with information from other sources, from time to time, we may obtain information about you from third-party sources, such as public databases, social media platforms, third-party data providers, and our joint marketing partners.

Examples of the information we receive from other sources include but not limited to demographic information (such as age and gender), device information (such as IP addresses), location (such as city and state), and online behavioral data (such as information about your use of social media websites, page view information and search results and links). We use this information, alone or in combination with other Personal Information we collect, to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant products, features, and service.

We may also collect some information from other sources, including but not limited to:

- if we have a business relationship with the organization that you represent, your colleagues or other business contacts may give us information about you such as your contact details or details of your role in the relationship; and
- information from third party data providers or publicly available sources for anti-money laundering, background checking and similar purposes, and to protect our business and comply with our legal and regulatory obligations.

If you provide information to us about another person, you should ensure that you comply with any legal obligations that may apply to your provision of the information to us.

### **Information We Obtain By Automated Means**

When you visit our Sites or open our emails, we may collect certain information by automated means (such as by cookies, web server logs, web beacons and JavaScript). The information we collect in this manner includes your IP address, network location, browser characteristics, device characteristics, operating system, referring URLs, information on actions taken on our Sites, and dates and times of website visits. Cookies are files that websites send to your computer or other Internet-connected device to uniquely identify your browser or to store information or settings on your device. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Please see our cookie policy information about what cookies are and how we use cookies and similar technology.

We also may use these and similar technology in emails we send you to collect certain information, such as whether you opened or clicked on links in our email.

Our Sites may use cookies (such as HTTP, HTML5 and Flash cookies) as well as other types of local storage (such as browser-based or plugin-based local storage). Some of these cookies may be placed by third parties such as our service providers. Your browser may tell you how to be notified when you receive certain types of cookies and how to restrict or disable certain cookies. You also may be able to delete your Flash cookies or adjust your Flash cookie settings by visiting the Adobe Flash Website Storage Settings Panel and Global Storage Settings Panel. Please note, however, that without cookies you may not be able to use all of the features of our Sites or other websites and online services.

In conjunction with gathering information through cookies, our web servers may log information such as your device type, operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone in which your device is located. We also may record information such as the address of the web page that referred you to our Sites and the IP address of the device you used to connect to our Sites. We may log information about your interaction with the Site, such as which pages you visit. To control which web servers collect information by automated means, we may place tags on our web pages called "web beacons", which are small files that link web pages to particular web servers and their cookies. We also may send instructions to your device using JavaScript or other computer languages to gather the sorts of information described above and other details about your interactions with the Sites.

We may use third-party web analytics services on our Sites, such as those of Google Analytics. These service providers help us analyze how visitors use the Sites. The information obtained for this purpose (including your IP address and other information collected by automated means) may be disclosed to or collected directly by these service providers. To learn about opting out of Google Analytics, please [click here](#).

The providers of third-party plugins and widgets on our Sites, such as embedded videos and social media sharing tools, may use automated means to collect information regarding your use of the Sites and your interactions with the plugins and widgets. This information is subject to the privacy policies or notices of the providers of the plugins and widgets.

### **How We Use the Information We Obtain**

Tongston generally collects the personal information necessary to fulfill your request and meet our internal requirements. Where additional optional information is sought, you will be notified of this at the point of collection.

We may use, process, disclose or otherwise handle the information described in this Notice for the following purposes to:

- operate, evaluate, develop, promote, and improve our business (including developing new products and services; enhancing, improving and analyzing our products and services; managing our communications; managing our premises; and performing accounting, auditing and other internal functions);
- create and manage your account;
- manage your investments;

- comply with and enforce applicable legal requirements, relevant industry standards and our policies;
- protect against, identify and prevent fraud, money-laundering, breach of confidence, cyber attack, theft of proprietary materials, financial or business crimes, and other unlawful activity;
- in some cases, in order to operate, administer and improve the user's experience of the Sites;
- provide our products and services to you, such as market commentary and email alerts;
- send you (or produce) promotional materials, newsletters and other communications, including in visual and audio form (such as videos, podcasts and online seminars);
- communicate with you about, and administer your participation in, special events, programs, promotions, offers, surveys and market research;
- respond to your inquiries;
- manage your employment application, assess your qualifications and manage your employment with us;
- verify your information;
- perform data analyses (including market and consumer research, demographic analyses and anonymization and aggregation of information);
- operate, schedule and facilitate online meetings, webinars and (video) conferences (for example, using Zoom and other online meeting platforms);
- record audio and video content (for example, of our in-person or online events, training, and meetings where permitted by, and collected in accordance with, applicable data protection law);
- Perform a contract: this is when the processing of your personal information is necessary in order to perform our obligations under a contract;
- discharge a Legal obligation: this is when we are required to process your personal information in order to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
- or for Legitimate interests: we may process information about you where it is in our legitimate interest in running a lawful business to do so in order to further that business, so long as it doesn't outweigh your interests; or
- do so with Your consent: in some cases, we will ask you for specific permission to process some of your personal information, and we will only process your personal information in this way if you agree to us doing so.

Examples of the 'legitimate interests' referred to above are but not limited to:

- To offer information and/or services to individuals who visit our website or offer information about employment opportunities.
- To prevent fraud or criminal activity and to safeguard our IT systems.
- To customize individuals' online experience and improve the performance usability and effectiveness of Tongston's online presence.
- To conduct, and to analyze, our marketing activities.
- To meet our corporate and social responsibility obligations.

In addition, we use information collected through cookies, web beacons, web server logs and other automated means for purposes such as (i) customizing our users' visits to our Sites, (ii) delivering content tailored to our users' interests and the manner in which our users browse our Sites, and (iii) managing our Sites and other aspects of our business.

CCTV may operate in some of our buildings for security and safety purposes, in accordance with applicable data protection law. Where CCTV is not operated by us, the CCTV will be under the control of the relevant building landlord, manager or operator.

We or the third party may also use the information in other ways for which we provide specific notice at the time of collection.

We will only process your Personal Data as necessary so that we can pursue the purposes described above. Where we process your Personal Data for our legitimate interests as a business or those of a third party, we do so only where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes.

When we collect Personal Data from you, unless indicated otherwise, if we ask you for information, we need it for our business or compliance purposes. In limited circumstances, we are required to collect Personal Data to comply with a legal obligation and/or might ask you to provide information which is purely voluntary; in either case, this will be indicated to you.

If you are a former employee, worker, contractor or member of Tongston, we will continue to process your Personal Data for a reasonable period following the end of your employment or engagement for our legitimate business, alumni database, due diligence and/or our legal compliance purposes and/or for the establishment or defense of a legal claim. Further, in some instances, we may process your data to perform our obligations under the contract between us (e.g. to pay you your final salary payment after your termination date). We only carry out such processing where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interests in pursuing those purposes. Your data will be retained and deleted in accordance with our retention policies and procedures (as discussed further below and in our documentation policy).

### **Online Tracking and Interest-Based Advertising**

We and third parties acting on our behalf (such as Facebook, Twitter and LinkedIn) may collect information about your online activities over time and across third-party websites to provide you with advertising about products and services tailored to your interests. Where required by applicable law, we will obtain your consent for the processing of your Personal Data for direct marketing purposes. If you do receive direct marketing communications from us (for example, by post, email, fax or telephone), you may opt-out by clicking the link in the relevant communication, completing the forms provided to you (where relevant).

You may see our ads on other websites or mobile apps because we participate in advertising networks. Ad networks allow us to target our messaging to users by considering demographic data, users' inferred interests and browsing context. These networks track users' online activities over time by collecting information through automated means (such as by cookies, web server logs, web beacons and other similar technologies). The networks use this information to show ads that may be tailored to individuals' interests, to track users' browsers or devices across multiple websites or apps, and to build a profile of users' online browsing activities. The information our ad networks may collect includes data about users' visits to websites and apps that participate in the relevant ad networks, such as the pages or ads viewed and the actions taken on the websites or apps. This data collection takes place both on the Sites and on third-party websites and apps that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts

The Sites are not designed to respond to "do not track" signals received from browsers. To learn how to opt out of ad network interest-based advertising, please visit [www.aboutads.info/choices](http://www.aboutads.info/choices), <http://www.networkadvertising.org/choices/> or <http://www.youronlinechoices.eu/>.

### **Information We Disclose to Others**

We do not disclose Personal Data we obtain about you through the Sites or other channels covered by this Privacy Notice, except as described in this Privacy Notice. We may share your Personal Data with our affiliates, partners, clients and subsidiaries. Depending on the nature of our relationship with you, we also share Personal Data with service providers who perform services on our behalf (including cloud services), our financial and transaction counterparties, our professional advisors, and your agents and representatives. We do not authorize these persons to use or disclose the information except as necessary for the purposes for which it is provided or to comply with the relevant requirements.

We also may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities, regulators and/or other government entities and/or other competent authorities based on a lawful disclosure request, or (iii) when we believe disclosure is necessary or appropriate to prevent harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We reserve the right to transfer Personal Data we have about you or otherwise process in the event that we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, spin-off, dissolution or liquidation). In addition, we may share anonymous/aggregated information with third parties, such as service providers, in order to facilitate our business operations.

Information collected through third-party plug-ins and widgets on the Sites (such as information relating to your use of a social media sharing tool) is collected directly by the providers of the plug-ins and widgets. This information is subject to the privacy policies of the providers of the plug-ins and widgets, and Tongston is not responsible for those providers' information practices.

### **Statistics**

This website uses simple web statistical analytics to help the website analysis and monitor how users use the site. The information generated is solely used for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. This information is not user specific and no user specific information is stored or passed onto any third parties as required by law. You may refuse the use of cookies by selecting the appropriate settings on your browser.

However, please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of any data about you that is collected in the manner and for the purposes set out above. Tongston is registered in Nigeria and in the process of being registered in Mauritius.

### **Intellectual property**

All materials within the site or linked to the site are the intellectual property of Tongston except as otherwise stated. Such materials may not be copied save to the extent necessary to view them online. You may not print complete pages of the site as hard copies or as pdf versions or similar edited e - readable versions for your own personal or any other use.



You may not copy, reproduce, distribute, publish, display, perform, modify, create derivative works, transmit, or in any way exploit any such content, nor may you distribute any part of this content over any network, including a local area network, sell or offer it for sale, or use such content to construct any kind of database. You may not alter or remove any copyright or other notice from copies of the content on the document or any other platforms. Copying or storing any content except as provided above is expressly prohibited without prior written permission of Tongston or the copyright holder identified in the individual content's copyright notice. For permission to use the contents, please contact the legal, policy, regulatory and governance team [lprg@tongston.com](mailto:lprg@tongston.com), with business development, stakeholder management and strategy team in copy, [bdsms@tongston.com](mailto:bdsms@tongston.com).

### **Accuracy of information**

Whilst Tongston uses reasonable endeavors to ensure that the contents of this site are accurate and up to date, it does not accept any liability for any information which may not be accurate. Tongston is reliant upon third parties for much of the information provided (see below) and reserves the right to change data, references and product specifications at any time.

The contents of this site are for general information and public relations purposes only and do not purport to provide advice, make any offer or otherwise create or lead to the creation of any legally enforceable relationship between Tongston and you. No reliance should be placed on any statements made on the site, whether for investment purposes or otherwise. Tongston excludes to the fullest extent permitted by law all liability resulting from your access to the site including (without limitation) any loss (financial or otherwise) or damage resulting directly or indirectly from any such reliance. Tongston accepts no liability or responsibility whatsoever for any other websites which may be accessed through the site or other subsidiary or affiliate sites.

Given that the Internet is a global environment, using the Internet to collect and process personal data necessarily involves the transmission of data on an international basis. Therefore, by browsing this website and communicating electronically with us, you acknowledge and agree to our processing of personal data in this way. In some cases, we may collect information about you that is not personally identifiable. This type of information includes the type of Internet browser you are using, the type of computer operating system you are using and the domain name of the website from which you linked to our site or advertisement. Cookies are small text files that are placed on your computer by websites that you visit.

### **Data Transfers**

We may transfer the Personal Data we collect about you to recipients in countries other than the country in which the information was originally collected. Where you are based in the UK, the EU, or another country which imposes data transfer restrictions outside of its territory. This includes transfers outside of the UK and the European Economic Area ("EEA") or that geographical area, including to those countries in which our affiliates, group members, service providers and business partners operate. Those countries may not have the same data protection laws as the country in which you initially provided the information.

### **Retention and Deletion of your Information**

We intend to keep your Personal Data accurate and up-to-date. We will delete the information that we hold about you when we no longer need it. We retain your Personal Data for as long as it is required by us for our legitimate purposes, to perform our contractual obligations, or where longer, such longer period as is required or permitted by law or regulatory obligations which apply to us.

We will retain your information in line with our retention policies and, in any event, for no longer than is necessary given the purpose for which it was collected, after which it will be deleted or anonymized.

Note that we may retain some limited information about you (even when we know that you have left the organization that you represent) so that we can maintain a continuous relationship with you if and when we are in contact with you again.

### **Your Rights and Choices**

We offer you certain choices in connection with the Personal Data we collect from you. To update your preferences or submit a request, please contact us as indicated in the “How to Contact Us” section of this Privacy Notice. To the extent provided by the law of your jurisdiction or otherwise applicable to our processing of your information, you may request access to the Personal Data we maintain about you or request that we correct, amend, delete or block the information by contacting us as indicated below. Where provided by law, you may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your Personal Data, and we will apply your preferences going forward. These rights, subject to certain limitations, may include:

Rights of access, correction and deletion. You may have a right of access to the Personal Data that we hold about you, and to some related information, including the purpose for processing the Personal Data, the categories of recipients of that Personal Data to the extent it has been transferred internationally, and, where the Personal Data has not been collated directly from you, the source (the “category information”). You may also have the right to require any inaccurate Personal Data to be corrected or deleted. You must contact us accordingly on [it@tongston.com](mailto:it@tongston.com) copying [lprg@tongston.com](mailto:lprg@tongston.com) should you wish to do so explicitly stating this request.

Right to object, and portability. You can object to our use of your Personal Data for direct marketing purposes at any time in writing providing details of such request and justification and you may have the right to object to our processing of some or all of your Personal Data in some other circumstances.

We review and verify requests to protect your Personal Data, and will action data protection requests fairly and in accordance with applicable data protection laws and principles and our policies and procedures.

If you wish to exercise any of these rights, please contact us as set out below.

### **How We Protect Personal Data**

We maintain administrative, technical and physical safeguards designed to protect Personal Data we obtain through the Sites against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

### **Links To Other Websites**

Our Sites may provide links to other websites for your convenience and information. These websites may operate independently from us. Linked websites may have their own privacy notices or policies, which we strongly suggest you review. To the extent any linked websites are not owned or controlled by us, we are not responsible for their content, any use of the websites, or the privacy practices of the websites.

### **Updates To Our Privacy Notice**

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our Personal Data practices. We will post the updated version on the Sites and indicate at the top of the Notice when it was most recently updated. Please check for any updates regularly.

Tongston reserves the right to from time to time request for information through surveys, monitoring and evaluation assessments, requests for testimonials and other such forms of information and data collection request. You are obliged to answer any such requests. You may however opt out of surveys should you wish to by contacting [lprg@tongston.com](mailto:lprg@tongston.com).

### **How To Contact Us**

If you have any questions or comments about this Privacy Notice, or if you would like us to update information we have about you or your preferences, please email us at [lprg@tongston.com](mailto:lprg@tongston.com) with the subject Privacy Notice Queries with a letter signed and written by you detailing the requests. We will not be able to process the request unless it is sent in this exact format.

Please also contact us via our head office in FCT Nigeria if you have a disability and require an alternative format of this Privacy Notice at [info@tongston.com](mailto:info@tongston.com) copying [lprg@tongston.com](mailto:lprg@tongston.com)