1. **INTRODUCTION**

Our pharmacy respects the privacy rights of our customers and employees and is committed to protecting the personal information that we collect from you. We have adopted this Privacy Policy to guide how we collect, use and disclose the information you provide to us. Our Practices complies with the data protection rules and guiding principles set out in the Nigeria Data Protection Regulations 2019 (NDPR. Generally, this legislation applies to the collection, use and disclosure of personal information in the course of commercial activities, including pharmacy services and retail stores. This legislation may apply to information we currently have on record and have always collected, used and disclosed to provide our customers with pharmacy services.

We reserve the right to disable any user identification code or password whether chosen or allocated by us at any time If in our opinion you have failed to comply with any of the provisions of these conditions

**2.0 WHAT PERSONAL DATA IS COLLECTED?**  
  
When you use our website, any service we provide or in your interaction with us, the personal data we may collect includes:-  
  
(a)**Data collected directly from you.** This may be done through this website, over the phone, by email, or in-person when you meet our staff or representatives. The data collected may include, but is not limited to:  
• your contact information, including your (first and last) name, (billing and/or delivery) address, birthdate, and email address and, optionally, your telephone number. We need your e-mail address and (optionally) telephone number so that we may contact you if we have questions or information for you regarding your order or the service that we are providing or will provide to you;

• other information required to be able to process your order or to provide you with the service, such as information concerning the products you have ordered or the service we are providing to you, the billing and/or delivery address, banking and/or credit card details;

• if you have created an online profile or account, the preferences and interests stored in such profile or account; and

• if you have contacted customer service, the details of this contact and the contact history.  
  
(b) **Data collected by automated means**. Various technologies may be used on our website to make it more user-friendly, effective and secure. Such technologies may lead to data being collected automatically by us or by third parties on behalf of us.

**3.0 WHAT DO WE DO WITH YOUR INFORMATION?**  
  
We use your personal data to serve you. This includes, where applicable:-

• providing you with the products and services that you have requested e.g. notifying you regarding the status of your order or delivery

• ensuring that your transactions on our websites are safe and secure;  
• providing you with a convenient shopping experience;  
• contacting you for feedback after a sale of a product or service; and  
• resolving any problems or disputes you may encounter concerning our products and

**4.0 HOW WE COLLECT PERSONAL INFORMATION**

We collect information about you and any other party whose details you provide to us when you:

> To improve our Site through feedback you provide on our products and services;

> Complete online forms;

> Take part in surveys;

> Interact with us using our social media platforms;

> Download and register on our online application

> Contact us offline, for example by telephone, SMS, email, post or any other means of communication;

> Access and use any of our websites or portals from your devices (including mobile devices) and applications; and

> Share information with third parties that are entitled to share that information, but in each case as permitted by applicable laws.

> Employee engagement personal data forms (inclusive of medical report)

> Third parties data collection source:

> Credit reference agencies including credit ratings.

> Medical professionals and hospitals

**5.0 THIRD-PARTY COOKIES**

Our website uses cookies provided by trusted third-party such as Google Analytics, which is one of the most widespread and trusted analytics solutions on the web. This helps us to understand how You use the site and ways that We can improve Your experience.  
 **6.0** **CONSENT**  
  
How do you get my consent?  
  
When you provide us with personal information to complete a transaction, verify your credit card, place an order, arrange for a delivery or return a purchase, we imply that you consent to our collecting it and using it for that specific reason only.  
  
If we ask for your personal information for a secondary reason, like marketing, we will either ask you directly for your expressed consent, or provide you with an opportunity to say no.  
  
How do I withdraw my consent?  
  
If after you opt-in, you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at feedback@purelifepharmacy.ng

If you have consented, your personal data may be used by us for marketing products and services offered on the website or other products or services offered by Purelife Pharmacy (e.g. informing you of the latest activities, special offers, promotions or sending you newsletters).  
  
If we need to use your personal data for any other purposes, we will notify you and obtain your consent beforehand. You will be allowed to withhold or withdraw your consent for the use of your personal data for any purposes.  
  
**7.0 - DISCLOSURE**  
  
We will not sell your personal data to third parties.  
Your personal data may be disclosed and shared within Purelife Pharmacy Ltd to allow us to provide the products and services which you have requested.  
  
We may disclose or share your personal data with third parties who provide necessary services to us, such as:-  
• service providers and data processors working on our behalf and providing services such as hosting and maintenance services, analysis services, e-mail messaging services, delivery services, handling of payment transactions, solvency check and address check, etc; and  
• our consultants and professional advisers (such as accountants, lawyers, auditors).  
  
We will also disclose your personal data to third parties to comply with legal obligations or industry requirements. This includes disclosures to legal, regulatory, governmental, tax, and law enforcement authorities.  
  
**8.0 THIRD-PARTY SERVICES**  
  
In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.  
  
However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their privacy policies concerning the information we are required to provide to them for your purchase-related transactions.  
  
For these providers, we recommend that you read their privacy policies so you can understand how your personal information will be handled by these providers.  
In particular, remember that certain providers may be located in or have facilities that are located in a different jurisdiction than either you or us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.  
  
Once you leave our store’s website or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our website’s Terms of Service.  
  
**9.0 SOCIAL NETWORKS**  
  
Our website and mobile or web-based applications may provide you with social plug-ins from various social networks (such as Facebook and Instagram). If you choose to interact with a social network, your activity on our website will also be made available to social networks such as Facebook and Instagram.  
If you are logged in on one of the social networks during the visit of our website, the social network might add this information to your profile. If you are interacting with one of the social plug-ins, this information will be transferred to the social network. In case you do not wish such a data transfer, please log off on your social network before you enter our website.  
 We cannot influence this data collection and data transfer via the social plug-ins. Please read the privacy policies of those social networks for detailed information about the collection and transfer of personal data, what rights you have, and how you can achieve satisfactory privacy settings.  
  
**10.0 SECURITY**

We are committed to ensuring that Your information is secure. In order to prevent unauthorised access or disclosure, We have put in place reasonable physical, electronic and managerial procedures to safeguard and secure the information We collect online.

In particular, We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of Your personal transaction information and data stored on our Site.

Sensitive and private data exchange between the Site and its Users happens over a secured communication channel and is encrypted and protected. Transactions are also handled over a secure payment gateway. Also, the Pharmacy has implemented appropriate technical, physical and organisational measures designed to protect personal information against accidental or unlawful destruction, accidental loss, damage, alteration, unauthorised disclosure or access, as well as all other forms of unlawful processing.

**11.0 YOUR RIGHTS AS A DATA SUBJECT**

At any point while we are in possession of or processing your personal data, You, the data subject, have the following rights:

> Right of Access – You have the right to request a copy of the information that We hold about you

> Right of Rectification – You have a right to correct data that We hold about You that is inaccurate or incomplete

> Right to be Erased/Forgotten – In certain circumstances You can ask for the data We hold about You to be erased from our records

> Right to Restriction of Processing – Where certain conditions apply to have a right to restrict the processing

> Right of Portability – You have the right to have the data We hold about you transferred to another organisation (to be reused for Your own purposes)

> Right to Object – You have the right to object to certain types of processing such as direct marketing

> Right to Object to automated processing, including profiling – You also have the right to be subject to the legal effects of automated processing or profiling

> Right to Withdraw – You have the right to withdraw Your consent at any time  
  
**12.0 AGE OF CONSENT**  
  
By using this site, you represent that you are at least the age of majority in your state or province of residence, or that you are the age of majority in your state or province of residence and you have given us your consent to allow any of your minor dependents to use this site.

**13.0 CHANGES TO THIS PRIVACY POLICY**  
  
We reserve the right to modify this privacy policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on the website. If we make material changes to this policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.  
If our store is acquired or merged with another company, your information may be transferred to the new owners so that we may continue to sell products to you.

**14.0 COMPLIANCE WITH THE REGULATORS**

This Privacy Policy is in line with the provisions of Nigeria Data Protection Regulation, 2019 (Regulation), a regulation which describes how organisations including Purelife Pharmacy must collect, handle and store personal information and applies regardless of whether data is stored electronically, on paper or on other materials.

**15.0 GOVERNING LAW**  
  
This Policy is governed by the laws of the Federal Republic of Nigeria . You agree to submit to the exclusive jurisdiction of the Courts of the Federal Republic of Nigeria in any dispute relating to this Policy.  
  
**16.0 QUESTIONS AND CONTACT INFORMATION**  
  
If you would like to: access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information contact us at support@purelifepharmacy.ng