

PRIVACY POLICY

SMARTRADE has created this privacy policy in order to demonstrate the firm's strong commitment to privacy and data security. The following discloses the information use, disclosure and security practices for SMARTRADE's Web Sites. Information collected by us We hold data for two distinct purposes. Firstly, with consent, we hold data for those who wish to receive marketing communications from us. Secondly, we hold data for those who use our online web application to administrate and/or complete SMARTRADE questionnaires, to produce SMARTRADE reports. We will use and process your personal information, where you have requested us to do so, for the following purposes:

- to register you as a user of our Site;
- to provide you with online testing inventory services as requested by you;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- to manage queries, complaints, or claims.

Personal information about you which is collected by us in the course of your visit to this Site is kept confidential. Information required for the production of Team Role reports is collected via the SMARTRADE web application and stored on our secure servers located within the UK. Information gathered via www.SMARTRADE.com for marketing purposes is held by Agile CRM, on servers located in the USA. For more details, please see our 'Supplier Information'. SMARTRADE does not sell or disclose data to any third party without your consent.

What information do we collect from you, and why? If you expressly consent to receive marketing communications from us, we will collect and store your forename, surname, e-mail address and country, to enable us to direct you to the appropriate SMARTRADE representative in your country. We will use your details to send you information about SMARTRADE news, products and services which may be of interest to you. If you are completing a SMARTRADE questionnaire, we will collect and store:

- Your forename and surname – in order to print names on the report;
- Your e-mail address – to send reminders to complete parts of the questionnaire, confirm receipt of responses, and/or send copies of the report when compiled, if applicable;
- Responses to the SMARTRADE questionnaire itself – to calculate and compile a SMARTRADE report.
- If completing a Self-Perception questionnaire, we may additionally collect your organisation and department (this is optional, to assist account holders with file organisation) and gender, for the scripting of SMARTRADE reports.

SMARTRADE acts in two different capacities – as a data controller when processing customer data, and as a data processor in relation to the processing of individuals' data for the purposes of compiling reports on behalf of our customers. Who might we share your information with? Your data may be accessed by SMARTRADE employees and by your SMARTRADE account holder(s) who will be identified in the introductory screens prior to completion of your assessment. Your data is also accessible to our server providers and contractors who have signed confidentiality agreements with us, and will be anonymised when used for research purposes. As part of our research, we may also share collated, anonymised data publicly. If you're completing a questionnaire about someone else and that person asks to view their data, your privacy will be protected. What do we do with your information? We use your responses to the SMARTRADE questionnaire to calculate your SMARTRADE Team Role preferences and to compile a report analysing upon these findings. Your gender is used only to script reports and not in the calculation process. Your data will be held in our secure database and can be accessed by an account holder (someone in your organisation) both as a reference and to produce further reports. SMARTRADE is not responsible for the use of data by our account holders. We may use your information anonymously (and in conjunction with other data in our database) to look at general data trends in relation to Team Roles. Security Our Web Sites have security measures in place to protect the loss, misuse, accidental or unlawful destruction or unauthorised access of the information under our control. All pages that contain customer information are password-protected. Some customer information can be viewed online if a valid account name and password is entered. Customer information and password resets can only be sent to the e-mail address registered for the user. Our legal basis for processing data When you provide us with your details for marketing purposes, you are asked expressly to consent to us processing and storing your personal data in line with this policy. You have the right to withdraw your consent at any time in accordance with this policy. When you provide us with your details as part of the completion of a SMARTRADE questionnaire, this information is processed and stored on the basis of legitimate interest. This means that the data is required by SMARTRADE to fulfil the contract with you or your organisation to produce and issue a SMARTRADE report to you. You may request that your data be deleted. Please see our data deletion policy (www.SMARTRADE.com/privacy/data-deletion-policy.pdf) for more information on removing your data from our servers. If we make changes to this policy, we will post those changes on this Web Site and notify customers via e-mail where possible. +234 808 4510 614 | www.smartrade.ng | info@smartrade.ng

If you have any questions about this privacy statement, the practices of this Web Site, or your dealings with this Web Site, please e-mail: privacy@smartrade.ng.com When completing questionnaires or administering the SMARTRADE web application, you will be given the opportunity to consent to being contacted for marketing purposes in addition to receiving contact regarding the status of your questionnaire and report. However, data is held separately, with each purpose clearly defined. How long do we keep hold of your information? There is currently no limit to how long data may be held, although the resulting Team Role Report (PDF document) is deleted from our secure server after 90 days. It is up to the customer, as data controller, to ensure that data is not held longer than necessary for the purposes for which it is intended. You can request for your data to be anonymised or deleted from SMARTRADE's databases at any time. Please see our data deletion policy for more information (www.SMARTRADE.com/privacy/data-deletion-policy.pdf). SMARTRADE is not responsible for copies of reports downloaded by your account holder or others permitted access to your data by an account holder. How can you access the information held about you? If you purchased your own report, you can request a copy of this to be sent to you by e-mail at any time. If your organisation purchased the report on your behalf, your account holder will usually provide the report for a particular purpose, e.g. at a course or event. Please contact your account holder in the first instance. If your account holder does not respond, please refer to our Subject Access Request policy for more information: www.smartrade.ng.com/privacy/subject-accessrequest-policy.pdf. Summary We are committed to responsible data management. Data relating to identifiable individuals is only obtained, stored, processed and accessed:

- For defined and justifiable purposes;
- Securely and confidentially;
- Respecting individuals' rights of review and objection.

Unless required or permitted by law, personal data concerning race, politics, religion, health or sexuality is not processed without express consent.

We value your trust in us.