DATA DELETION POLICY

1. Purpose: This document sets out our policy for responding to requests for deletion of data under the GDPR (General Data Protection Regulation), which comes into force in March 2021. This document explains the rights of the data subject in relation to data deletion and the responsibilities of SMARTRADE in responding with such a request.

2. Individual Rights: An individual has the right to erasure, also known as 'the right to be forgotten'. The principle underpinning this right is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.

3. When does the right to erasure apply? Individuals have a right to have personal data erased and to prevent processing in specific circumstances: • Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed; • When the individual withdraws consent; • When the individual objects to the processing and there is no other legal ground for the relevant processing activity; • When the personal data was unlawfully processed; • Where the personal data has to be erased in order to comply with a legal obligation.

4. What information does SMARTRADE retain? We store the name, e-mail address, profession (if provided) and subsequent Team Role scores for each individual in order to create a report, which is stored on our secure servers. This data is stored and used in accordance with our Privacy Policy, which can be found at: www.smartrade.ng/static/privacy-policy.pdf.

5. How can data be deleted? A system administrator (individual user acting on behalf of their organization) can delete data from their Interplace system whenever they wish. This data is deleted from the system immediately and cannot be recovered by any users or SMARTRADE employees after this point. Data which has been deleted or otherwise destroyed can not be recovered at any time. Sufficient warning is given to the account administrator before they permanently delete anything.