WEBSITE PRIVACY POLICY

This privacy policy discloses the privacy practices for the website operated by **Eximp and Cloves Ltd** and applies solely to information collected by this website and to all users of the Company's website, including visitors who browse the site, individuals who submit inquiries or contact forms, clients who engage the Company's services, and any other persons whose **Personal Data** is processed through the website.

By accessing, browsing, or using the Company's website in any manner, users acknowledge that they have read, understood, and agree to be bound by the terms of this Privacy Policy.

This Policy governs the processing of **Personal Data** collected through:

(a) Direct interactions with the website, including contact forms, inquiry submissions, and service requests.

(b) Automatic data collection through **Cookies**, web analytics, and similar tracking technologies.

(c) Communications with the Company via email, telephone, or other channels initiated through the website.

This Privacy Policy does not apply to third-party websites, services, or platforms that may be linked to or accessible through the Company's website, and users access such external sites at their own risk.

The Company reserves the right to update this Privacy Policy periodically, and continued use of the website following any modifications constitutes acceptance of the revised policy terms.

2. Data Collection

2.1. The Company collects personal data from website users only when users voluntarily provide such information by filling out a contact form or subscribing to the Company's newsletter. The website does not otherwise store user data, and all other data collection (such as cookies and analytics) is handled by the third-party platform hosting the website.

2.2. **Types of Personal Data Collected** through contact forms and newsletter subscriptions:

(a) Contact information, including full names, email addresses, telephone numbers, and postal addresses provided through contact forms, inquiry submissions, or direct communications.

(b) Professional information, such as company names, job titles, business addresses, and industry details when provided in connection with commercial inquiries or service requests.

(c) Communication records include inquiry details, correspondence history, service preferences, and feedback provided through various communication channels.

(d) Marketing preferences and consent records, including subscription preferences for newsletters, promotional materials, and communication frequency selections.

2.3. **Methods of Data Collection:**

(a) Direct collection through the website's contact form and newsletter subscription form, where users voluntarily submit their information.

(b) Automatic data collection through cookies, web beacons, and similar tracking technologies is handled by the third-party platform hosting the website and is subject to that platform's privacy practices.

(c) Third-party analytics services, where applicable, are managed by the website hosting platform.

(d) Email communications and phone conversations initiated by users or conducted in response to user inquiries, with records maintained for service delivery and quality assurance purposes.

(e) Social media interactions when users engage with the Company's social media accounts or share website content through social media platforms.

2.4. The Company **does not** collect sensitive personal data, including information relating to health, religion, political opinions, trade union membership, or biometric data.

2.5. All data collection activities are conducted with appropriate notice to users, with clear information provided about the types of data being collected and the purposes for collection before any data is processed.

3. Purpose of Data Processing

The Company processes personal data collected through its Website for the following primary purposes, which are necessary for the effective operation of its real estate business and the provision of services to clients and prospective clients.

3.1. **Inquiry Response and Communication**

(a) To respond to inquiries submitted through contact forms, email, or other communication channels available on the Website.

(b) To provide information about the Company's real estate services, properties, and investment opportunities.

(c) To maintain ongoing communication with prospective and existing clients regarding their property interests and requirements.

3.2. **Service Provision and Contract Performance**

(a) To provide real estate services, including property sales, purchases, leasing, property management, and investment advisory services.

(b) To perform contractual obligations arising from agreements entered into with clients.

(c) To conduct property valuations, market analysis, and due diligence activities as required for client transactions.

3.3. **Marketing and Business Development**

(a) To send marketing communications about new properties, market updates, and promotional offers to individuals who have consented to receive such communications.

(b) To conduct market research and analysis to improve service offerings and identify business opportunities.

(c) To maintain client relationship management systems for business development purposes.

3.4. **Website Functionality and User Experience**

(a) To operate, maintain, and improve the Website's functionality, security, and user experience.

(b) To analyze Website usage patterns and user behavior to enhance content and navigation.

(c) To implement security measures and prevent fraudulent activities or unauthorized access to the Website.

3.5. **Legal and Regulatory Compliance**

(a) To comply with legal obligations under Nigerian law, including tax reporting, anti-money laundering requirements, and regulatory reporting to relevant authorities.

(b) To respond to lawful requests from government authorities, courts, or regulatory bodies.

(c) To establish, exercise, or defend legal claims and protect the Company's legitimate business interests.

3.6. **Record Keeping and Administration**

(a) To maintain accurate business records and client files in accordance with professional and legal requirements.

(b) To conduct internal audits, quality assurance, and compliance monitoring activities.

(c) To facilitate business continuity and disaster recovery procedures.

4. Lawful Basis for Processing

4.1. The Company processes personal data only where it has a lawful basis to do so under relevant Nigerian Data Protection laws and regulations.

4.2. **Consent**

(a) For this Policy, **Consent** means any indication of agreement by a Data Subject to the processing of their Personal Data, which may be given through a statement, affirmative action, or continued use of the Company's services or Website after being informed of this Policy.

(b) The Company may process personal data where the data subject has given clear, specific, and informed consent to the processing of their personal data for one or more specified purposes.

(c) Data subjects have the right to withdraw their consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

4.3. **Contractual Necessity**

(a) The Company may process personal data where processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

(b) This includes processing necessary to provide real estate services, respond to service inquiries, and fulfill contractual obligations to clients.

4.4. **Legal Obligation**

(a) The Company may process personal data where processing is necessary for compliance with a legal obligation to which the Company is subject under Nigerian law.

(b) This includes compliance with tax obligations, anti-money laundering requirements, regulatory reporting, and other statutory obligations applicable to real estate businesses in Nigeria.

4.5. **Court Order or Lawful Authorization**

(a) The Company may process personal data where required by a court order, warrant, or other lawful authorization from competent Nigerian authorities.

(b) Such processing will be limited to the scope and purpose specified in the relevant court order or authorization.

4.6. **Legitimate Interests**

(a) The Company may process personal data where processing is necessary for legitimate interests pursued by the Company, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.

(b) Legitimate interests include: operating and improving the Company's website and digital services; conducting business development and marketing activities; preventing fraud and ensuring network and information security; managing customer relationships and providing customer support; and internal administrative purposes and record-keeping.

(c) The Company will conduct balancing tests to ensure that legitimate interests do not override the rights and freedoms of data subjects.

4.7. **Vital Interests**

(a) The Company may process personal data where processing is necessary to protect the vital interests of the data subject or another person.

5. Data Storage and Security

5.1. The Company implements appropriate measures to ensure the security of Personal Data collected through contact forms and newsletter subscriptions. Data submitted through these forms is securely transmitted by Google to a designated spreadsheet for storage and processing.

5.2. **Technical Security Measures** currently in place include:

(a) Secure transmission of Personal Data via Google's infrastructure, which employs industry-standard encryption protocols for data in transit and at rest.

(b) Secure server infrastructure provided by Google and the website hosting platform, including firewalls, intrusion detection systems, and regular security monitoring maintained by those third-party providers.

(c) Access controls requiring unique user credentials, multi-factor authentication, and role-based access permissions are planned for future implementation as the Company's data processing activities expand.

(d) Regular software updates, security patches, and vulnerability assessments are managed by Google and the website hosting platform as part of their service offerings.

(e) Secure backup procedures with encrypted data storage are provided by Google's infrastructure for all data stored in the designated spreadsheet.

5.3. **Organizational Security Measures** include:

(a) Staff training programs on data protection principles, security protocols, and confidentiality obligations.

(b) Confidentiality agreements for all employees and contractors with access to Personal Data.

(c) Clear data handling procedures and protocols for the collection, processing, storage, and disposal of Personal Data.

(d) Incident response procedures for addressing security breaches or suspected unauthorized access.

5.4. Access to Personal Data stored in Google spreadsheets is currently limited to authorized Company personnel. As the Company's operations grow, formal access controls with unique user credentials and role-based permissions will be implemented.

5.5. Google acts as a Data Processor for the Company in respect of data collected through contact forms and newsletter subscriptions. The website hosting platform also acts as a Data Processor for any data collected through cookies and analytics. Both processors are required to implement appropriate security measures under their respective terms of service and privacy policies.

6. Data Retention

6.1. The Company shall retain Personal Data only for as long as necessary to fulfil the purposes for which it was collected and processed, in accordance with Nigerian data protection laws and legitimate business requirements.

6.2. **Client-Related Information,** including property inquiries, transaction records, communication logs, and service delivery data, shall be retained for as long as is required or until consent is withdrawn.

6.3. **Marketing and Communications Data,** including newsletter subscriptions, promotional materials preferences, and general inquiries, may be retained for as long as necessary or until consent is withdrawn, whichever occurs earlier.

6.4. **Legal and Compliance Records**, including data processed for legal obligations, court orders, or regulatory requirements, shall be retained for the period as is necessary to comply with such regulations or to reach a conclusive resolution of a legal matter or dispute.

6.5. Personal Data may be retained beyond the specified periods where required by Nigerian law or court order; necessary for the establishment, exercise, or defence of legal claims; where the Data Subject has provided explicit consent for extended retention; or where it is required for archiving purposes in the public interest or scientific research, subject to appropriate safeguards.

6.6. Upon expiry of the applicable retention period, Personal Data shall be deleted, destroyed, or anonymized unless retention is required by any clause of this policy or as permitted by the data subject.

6.7. The Company shall maintain records of data retention schedules and disposal activities to demonstrate compliance with this Policy and Nigerian data protection regulations.

6.8. Data Subjects may request information about the retention period applicable to their Personal Data by contacting the Company using the details provided in this Policy.

7. Third-Party Sharing

7.1. The Company may share personal data with third parties only in accordance with this Policy and applicable Nigerian data protection laws, ensuring that appropriate safeguards and contractual arrangements are in place to protect data subjects' rights.

7.2. **Legal Authorities and Regulatory Bodies**

(a) Personal data may be disclosed to Nigerian courts, law enforcement agencies, regulatory authorities, and other governmental bodies when required by law, court order, or lawful authorization.

(b) Such disclosures include compliance with judicial orders, regulatory investigations, tax and compliance obligations, and statutory reporting requirements under Nigerian law.

7.3. **Service Providers and Business Partners**

(a) The Company engages Google as a third-party service provider for secure data transmission and storage of contact form and newsletter subscription data. The website hosting platform provides website hosting, analytics, and cookie management services.

(b) Real estate transaction facilitators, including banks, mortgage providers, legal practitioners, surveyors, and property valuers, may receive personal data necessary to complete property transactions.

(c) Marketing and communication service providers may process personal data for the purpose of delivering promotional materials and communications with appropriate consent.

7.4. **Professional Advisors**

(a) Personal data may be shared with legal counsel, auditors, consultants, accountants, and other professional advisors for the purpose of obtaining professional services and ensuring regulatory compliance.

(b) Such sharing is based on legitimate interests and professional confidentiality obligations.

7.5. **Business Transfers**

(a) In the event of a merger, acquisition, reorganization, or sale of assets, personal data may be transferred to the acquiring entity or successor organization.

(b) Data subjects will be notified of any such transfer and their rights regarding transferred data.

(c) The Company shall ensure that appropriate data protection safeguards, including confidentiality agreements and security measures, are implemented throughout any business transfer process to protect Personal Data from unauthorized access, disclosure, or misuse during the transition period.

7.6. **Data Processors**

(a) The Company may engage Data Processors to process personal data on its behalf, subject to written agreements that ensure compliance with Nigerian data protection requirements.

(b) All Data Processors are contractually obligated to implement appropriate technical and organizational security measures and process data only in accordance with the Company's instructions.

7.7. **Emergency Situations**

(a) Personal data may be disclosed without consent where necessary to protect the vital interests of data subjects or other individuals in emergencies.

(b) Such disclosures will be limited to the minimum necessary and will be documented and reported as required by law.

7.8. **Consent-Based Sharing**

(a) Personal data may be shared with other parties where explicit consent has been obtained from the data subject for specific purposes.

(b) Consent may be withdrawn at any time, and such withdrawal will be processed in accordance with this policy.

7.9. The Company ensures that all third parties receiving personal data are bound by appropriate confidentiality obligations and data protection requirements equivalent to those set out in this Policy.

7.10. Data subjects have the right to request information about specific third-party sharing arrangements and may object to such sharing where legally permissible under Nigerian law.

8. Data Breach Notification

8.1. The Company shall establish and maintain comprehensive procedures for detecting, investigating, and responding to personal data breaches in accordance with the Nigeria Data Protection Regulation 2019 and applicable Nigerian law.

8.2. For this Policy, a **data breach** means any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored, or otherwise processed by the Company.

8.3. Upon becoming aware of a personal data breach, the Company shall:

(a) Immediately conduct an initial assessment to determine the nature, scope, and potential impact of the breach within twenty-four (24) hours of discovery.

(b) Implement immediate containment measures to prevent further unauthorized access, disclosure, or loss of personal data.

(c) Document all relevant details of the breach, including the circumstances of occurrence, categories and approximate number of data subjects affected, categories and approximate number of personal data records affected, and measures taken or proposed to address the breach.

8.4. Where the personal data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Company shall notify the affected individuals without undue delay and, where feasible, within **seventy-two (72) hours** of becoming aware of the breach.

8.5. The notification to affected data subjects shall be communicated in clear and plain language and shall include:

(a) The nature of the personal data breach and categories of data affected.

(b) The contact details of the Company's Data Protection Officer or designated contact point for further information.

(c) The likely consequences of the personal data breach and measures taken or proposed to address the breach and mitigate its adverse effects.

(d) Recommendations for actions that affected individuals can take to protect themselves from potential harm.

8.6. The Company shall maintain a comprehensive record of all personal data breaches, including the facts relating to the breach, its effects, and remedial actions taken, which shall be made available to NITDA upon request.

8.7. Following a data breach, the Company shall conduct a thorough post-incident review to identify the root cause, assess the effectiveness of response measures, and implement additional security measures to prevent similar breaches in the future.

8.8. The Company may engage qualified third-party forensic specialists or legal counsel to assist in breach investigation and response where the complexity or severity of the breach warrants such expertise.

8.9. All employees and contractors of the Company shall be trained to recognize potential data breaches and shall be required to immediately report any suspected or actual breaches to the designated Data Protection Officer or senior management.

9. International Data Transfers

9.1. The Company may transfer Personal Data outside Nigeria only in circumstances where such transfer is necessary for the provision of real estate services, compliance with legal obligations, or legitimate business operations.

9.2. Any international transfer of Personal Data shall be conducted in accordance with the NDPR and other applicable Nigerian data protection laws, ensuring adequate protection for the rights and freedoms of Data Subjects.

9.3. The Company shall ensure that international data transfers are made only to countries or territories that provide adequate levels of data protection as determined by NITDA or other competent Nigerian authorities.

9.4. Where transfers are made to countries without an adequacy decision, the Company shall implement appropriate safeguards, including standard contractual clauses approved by NITDA or other competent authorities; binding corporate rules where transfers occur within a corporate group; codes of conduct or certification mechanisms that provide appropriate guarantees; and specific authorization from NITDA, where required by law.

9.5. Data Subjects have the right to be informed of any international transfers of their Personal Data and may object to such transfers in accordance with their rights under Nigerian data protection law.

9.6. The Company maintains records of all international data transfers, including details of recipient countries, purposes of transfer, categories of Personal Data transferred, and safeguards implemented.

9.7. Where Personal Data is transferred to third-party processors outside Nigeria, the Company shall ensure such processors provide sufficient guarantees regarding data security measures.

9.8. The Company shall immediately notify NITDA of any international data transfers that may pose risks to the rights and freedoms of Nigerian Data Subjects, in accordance with applicable notification requirements.

10. Complaints and Dispute Resolution

10.1. Any individual who believes that the Company has processed their Personal Data in violation of this Privacy Policy or applicable Nigerian data protection laws may lodge a complaint through the procedures outlined in this section.

10.2. Internal complaints should be submitted in writing to the Company's designated **Data Protection Officer** or **Legal/Compliance Officer** at the contact details specified in section 15 of this Policy.

(a) Complaints may be submitted via email, postal mail, or in person during business hours.

(b) All complaints must include the complainant's name, contact information, details of the alleged violation, and any supporting documentation.

(c) Anonymous complaints will be accepted, but may limit the Company's ability to investigate and respond effectively.

10.3. The Company will acknowledge receipt of complaints within **five (5) working days** of receipt and provide an initial response within **twenty-one (21) days**.

10.4. The Company will conduct a thorough investigation of all complaints, which may include reviewing relevant records, interviewing personnel, and consulting with legal advisors as necessary.

10.5. Upon completion of the investigation, the Company will provide a written response to the complainant outlining the findings, any corrective actions taken, and available remedies.

10.6. The Company will maintain records of all complaints received, investigations conducted, and resolutions provided for a minimum period of **seven (7) years** in compliance with regulatory requirements.

10.7. No individual will face retaliation, discrimination, or adverse consequences for lodging a complaint in good faith regarding data protection concerns.

11. Governing Law and Jurisdiction

11.1. This Privacy Policy and all matters arising from or relating to the collection, processing, storage, and protection of personal data by the Company shall be governed by and construed in accordance with the laws of the Federal Republic of Nigeria.

11.2. Any disputes, claims, or proceedings arising from or in connection with this Privacy Policy, the Company's data processing activities, or the exercise of data subject rights shall be subject to the exclusive jurisdiction of the courts of the Federal Republic of Nigeria.

11.3. Where international data transfers are involved, Nigerian law shall take precedence in determining the lawfulness and adequacy of such transfers and protective measures implemented by the Company.

11.4. This Privacy Policy shall be interpreted in accordance with Nigerian legal principles and practices.

12. Updates

12.1. Our Privacy Policy may change from time to time and all updates will be posted on this page. We reserve the right to modify this Privacy Policy at any time to reflect changes in business practices, legal requirements, or regulatory guidance under Nigerian data protection law.

12.2. **The effective date** of any amendment shall be clearly stated in the updated Privacy Policy.