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# WEBSITE PRIVACY

## Document Classification


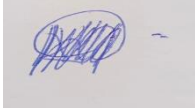
Confidential	
Restricted	
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## Review

Designation	VERSION	Name	Date
DPO/LEGAL OFFICER	1.0	ITEPU HAPPY. P	06 <sup>TH</sup> NOVEMBER, 2023
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## APPROVAL

Name	Designation	VERSION	Signature	Date
CLEMON AIGBOGUN IZIENGBE	MANAGING DIRECTOR/ CEO	1.0		4 <sup>TH</sup> DECEMBER, 2023
NASIR KA'OJE	DIRECTOR	1.0		4 <sup>TH</sup> DECEMBER, 2023

## Revision history

REVISION	DATE	DESCRIPTION OF CHANGES	PREPARED BY
1.0	6 <sup>TH</sup> NOVEMBER, 2023	Initial	DPO

## Distribution history

Revision	Date	Stakeholders
1.0	15 <sup>TH</sup> FEBRUARY, 2024	ALL STAFF

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## 1. Introduction

### 1. Scope

This Teasy International Company Limited website privacy policy tells you about the information we collect from you when you use our website. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

### 2. References

Clause/Section	Description
4/Article 3.1(7)m	HANDLING PERSONAL DATA

### 3. Terms and Definitions

- “us” ,”we” and “our” refer to Teasy International Company Limited

#### 4. Responsibilities

The DPO is responsible for all aspects of the implementation and management of this policy, unless noted otherwise.

IT managers are responsible for the implementation of this policy, within the scope of their responsibilities, and must ensure that all staff under their control understand and undertake their responsibilities accordingly.

## 2. How we use your information

### 2.1. When you use our website

When you use our website to browse our products and services and view the information, we make available, a number of cookies are used by us and by third parties to allow the website to function, to collect useful information about visitors and to help to make your user experience better. Some of the cookies we use are strictly necessary for our website to function, and we don't ask for your consent to place these on your computer. These cookies are shown below.

PHPSESSID	To ensure basic site functionality works	Preserves user session state across page requests
Test cookie	To ensure basic site functionality works	Used to check if the user's browser supports cookies.
formillaAutoMessageList, formillaIsChatWindowOpen, formillaLastAutoMessageIdDisplayed & testFormillacookie	For site webchat functionality works.	Required for the webchat functionality in the website to work.

*Table 1: Cookies (strictly necessary)*

However, for those cookies that are useful but not strictly necessary we will always ask for your consent before placing them. These are:

__ga	Statistics	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
__gat	Statistics	Used by Google Analytics to throttle request rate.

_gid	Statistics	Registers a unique ID that is used to generate statistical data on how the visitor uses the website.
ads/ga-audiences	Marketing	Used by Google AdWords to reengage visitors.
IDE	Marketing	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user.

## 2.2. When you submit an Inquiry Via our website

When you submit an enquiry via our website, we ask you for your name, contact telephone number and email address. We use this information to respond to your query, including providing you with any requested information about our products and services. We may also email you several times after your enquiry in order to follow up on your interest and ensure that we have answered you to your satisfaction. We will do this based on our legitimate interest in providing accurate information prior to a sale.

Your enquiry is processed and emailed to our Head of ICT and his/her service team. This team is based in our head office. Our Head of ICT will on occasion work remotely as required by our provision. Enquiry information is not stored in a database and enquiry information is deleted as our email servers periodically delete non archived sent and deleted items. We do not use the information you provide to make any automated decisions that might affect you.

The records for our on-programmers are kept for three years after the last contact with you.

## 2.3. Your rights as a Data Subject

By law, you can request the following;

- ask us what information we hold about you, and you can ask us to correct it if it is inaccurate.
- If we have asked for your consent to process your personal data, you may withdraw that consent at any time.
- If we are processing your personal data for reasons of consent or to fulfil a contract, you can ask us to give you a copy of the information in a machine-readable format so that you can transfer it to another provider.
- If we are processing your personal data for reasons of consent or legitimate interest, you can request that your data be erased.
- You have the right to ask us to stop using your information for a period of time if you believe we are not doing so lawfully.
- Finally, in some circumstances you can ask us not to reach decisions affecting you using automated processing or profiling.

To submit a request regarding your personal data by email, post or telephone, please use the contact information provided above in the Who Are We section of this policy.

## 2.4. Your rights to complain

If you have a complaint about our use of your information, we would prefer you to contact us directly in the first instance so that we can address your complaint. However, you can also contact the Information Commissioner's Office via their website or write to them with their information available on their webpage.

### **2.5. Updates to this Policy**

We regularly review and, if appropriate, update this privacy policy from time to time, and as our services and use of personal data evolves. If we want to make use of your personal data in a way that we haven't previously identified, we will contact you to provide information about this and, if necessary, to ask for your consent.

We will update the version number and date of this document each time it is changed.

### **3. Breaches of Policy**

Teasy International Company Limited will take all necessary measures to remedy any breach of this policy including the use of our disciplinary or contractual processes where appropriate.

### **4. Records**

Records retained in support of this policy are controlled according to the Data Retention policy