

Privacy Policy

Effective date: June 1, 2021

This Policy applies to independent contractors, job applicants and individuals who provide SME Springboard with their personal information.

This Privacy Policy explains:

- What personal information we collect
- How we collect and use your personal information
- Disclosure
- Your right of access to your personal information
- Your right to inspect and, if necessary, correct the personal information that we hold about you
- Your right to have your privacy complaints investigated and resolved
- Your right to have your personal information protected from misuse or unauthorised access

What personal information do we collect?

Personal information is any information that can be used to identify a person no matter how it is collected or recorded. Generally, personal information is collected by SME Springboard from a variety of sources, including when dealing with members or customers, when dealing with individuals, undertaking marketing initiatives, or when recruiting.

Should we collect personal information from you this may include (but is not limited to) your name, address, email address, telephone numbers, and other means of personal identification.

Where possible, we collect your personal information directly from you. If you feel that the information that we are requesting, either from our website (<http://www.smespringboard.com>), on our forms, or in our discussions with you, is not information that you wish to provide, please feel free to raise this with us.

In some circumstances, SME Springboard may obtain personal information from a third party. If you provide personal information about another person to SME Springboard, SME Springboard requires that you inform that person you have done so and provide them with a copy of this policy.

When dealing with tutorial registrations, fulfilling your registrations to events, webinars, participating in surveys or purchasing services, SME Springboard will collect, at a minimum, the following:

- Name of the contact person or people from the organisation
- Business address, email address and other contact details
- Nature of services being sought for the purposes of filling your order

The personal information may be provided by you using our web site or by telephone, business cards, contracts, applications, competition entries, survey entries, registration forms, face-to-face or in writing.

We will use this information to provide services, and may also use it for product development and marketing purposes.

If at any time you provide personal information about anyone other than yourself, you warrant to us that you have that person's consent to provide such information for the purpose specified.

You are not obliged to give us your personal information. If you would like to access any of our services or features of our website on an anonymous basis, we will take reasonable steps to comply with your request.

Other information collected by automated methods

We also collect information that is not personal information, such as data relating to your activity on our website.

We do not collect Sensitive Information about you unless it is necessary and we have your consent

Other Information we collect may include:

- The Internet Protocol address and a component of the domain name used (e.g., .com or .net);
- The type of browser and operating system you used;
- The date and time you visited our web site;
- The web pages or services you accessed at our web site;
- The time spent on individual pages and our web site overall;
- Which files you downloaded; and
- Information about your computer and Internet connections using cookies.

We have integrated Google Analytics into our web site (see <http://www.google.com/analytics> for details). This enables the collection of data about traffic on our web.

We use Google Analytics Demographics and Interest Reports to obtain a more detailed understanding of our web site users and their potential needs. Data collected from such reports may be used to more accurately target marketing and advertising campaigns based on demographic information and more generally for the Primary Purpose and additional purposes detailed in this Policy. We do not collect data on individuals by such methods; only aggregate data is used for planning purposes

Job applicants

When dealing with job applicants, SME Springboard collects the following:

- Name
- Address/contact details
- Occupation
- Career history
- References

SME Springboard collects this information in the course of a job application form, job interviews, telephone discussions, reference checks and in writing. SME Springboard will use this information to assess the suitability of applicants for a position.

How do we use the information you provide?

We will not use your personal information for any purpose which is not related to the primary purpose for which it is collected. This includes:

- To deliver the services that you requested
- To provide you with further information about the services you requested
- To personalise and customise your experiences with SME Springboard
- To help SME Springboard to review, manage and enhance its services
- To develop insights used in reports or other content developed by SME Springboard and its affiliated entities
- To communicate with you
- For administration purposes, including charging, billing and collecting debts
- To promote and market other products and services of SME Springboard and its affiliated entities which we consider may be of interest to you.

We will not use your personal information for any purpose for which you would not reasonably expect us to use your personal information.

In addition to the primary purpose, we may use the personal information we collect and you consent to SME Springboard and its affiliated entities using your personal information to:

- Provide you with news about any products and services;
- Send you marketing and promotional material that you may be interested in;
- Communicate with you, including by email, telephone and mail;
- Manage and enhance products or your experience on our web site and the domains of SME Springboard and its affiliated entities;
- Conduct surveys or promotions;
- Verify your identity;
- Investigate any complaints about, or made by you, or if we have reason to suspect you have breached any relevant terms and conditions; or
- As required or permitted by any law.

We will take all reasonable steps to ensure that the personal information that we hold is accurate and up-to-date. If you feel that information about you is not accurate, or your details have or are about to change, you can call us on +234-803-4433-443 and we will correct or update your personal information.

What happens if you choose not to provide your personal information?

You are not obliged to give us your personal information. If you would like to access any of our services on an anonymous basis, or using a pseudonym, we will take all reasonable steps to comply with your request. However, if you choose not to provide SME Springboard with personal details, such as your name or address, the range of options available to you may be limited.

When do we disclose your personal information?

SME Springboard and affiliated entities may disclose personal information (with the exception of payment information details) and you consent to us disclosing such personal information to:

- Third parties engaged by SME Springboard or its affiliated entities to perform functions or provide products or services on our or their behalf such as mail outs, marketing or advertising;
- Third parties that sponsor or promote SME Springboard or its affiliated entities;
- Persons authorised by you to receive information held by SME Springboard or its affiliated entities; and
- Any persons as required or permitted by any law

You will generally be given the opportunity to 'opt out' from receiving communications in accordance with this Policy. You may 'opt out' by:

- Clicking a link on the email communications sent to you;
- Contacting us on +234-803-4433-443 or at unsubscribe@smespringboard.com;
- Writing to the Privacy Officer at SME Springboard, through Index Consulting 1 Engineering Close, Victoria Island, Lagos State, Nigeria.

Access and corrections to your personal information

You have a right to access your personal information, subject to certain exceptions provided for in accordance with our access policies.

If you require access to your personal information, please contact the Privacy Officer at SME Springboard, through Index Consulting 1 Engineering Close, Victoria Island, Lagos State, Nigeria.

You are required to put your request in writing and provide proof of identity.

We request that you keep your personal information as current as possible.

You may, upon inspection of the personal information we hold about you, write to us to correct any errors in the personal information.

Security and protection of your personal information

Other than in relation to other information, we will take all reasonable steps to protect the personal information that we hold about you from misuse, loss or unauthorised access and disclosure including by means of password access (where applicable) and secure servers.

You acknowledge that the security of communications sent by electronic means or by post cannot be guaranteed. We cannot accept responsibility for misuse, loss or unauthorised access to your Personal Information where the security of information is not within our control.

If you suspect any misuse or loss of your personal information please contact us immediately.

Complaints

If you have a complaint about how we collect, use, disclose, manage or protect your personal information please contact us in writing.

Complaints will be handled in accordance with SME Springboard's Complaints Policy, which you can request a copy of from us at any time during business hours (9am to 5pm Nigerian Time).

We will respond to any written complaint within 30 days of receiving the complaint.

Contact

Please forward all correspondence in respect of this Privacy Policy to the Privacy Officer who can be contacted by mail, telephone or email as follows:

Index Consulting

1 Engineering Close,

Victoria Island, Lagos State,

Nigeria.

P: +234 803 4433 443

E: unsubscribe@smespringboard.com

Interpretation and definitions

Personal pronouns: except where the context otherwise provides or requires:

- The terms we, us or our refers to SME Springboard; and
- The terms you or your refers to a user of the web site.

Defined terms: in this Privacy Policy unless otherwise provided, the following terms shall have their meaning as specified:

Affiliated entities means SME Springboard's subsidiaries, affiliates, associated entities and relevant partners as the case may be or the context requires from time to time.

SME Springboard means SME Springboard a product of Index Consulting via Index Consulting 1 Engineering Close, Victoria Island, Lagos State, Nigeria.

Web site means the SME Springboard web site at www.smespringboard.com and that of its affiliate entities including its sub-domains regardless of how it is accessed by users (including via the internet, mobile phone or any other device or other means).

Privacy Policy means this Privacy Policy of SME Springboard as amended from time to time.

Sensitive information means:

- Information or an opinion about an individual's:
- Racial or ethnic origin; or
- Political opinions; or
- Membership of a political association; or
- Religious beliefs or affiliations; or
- Philosophical beliefs; or
- Membership of a professional or trade association; or
- Membership of a trade union; or
- Sexual preferences or practices; or
- Criminal record;
- That is also personal information; or
- Health information about an individual

SME Springboard reserves the right to review, and if necessary, change this Privacy Policy.