



ARABATECH DATA PRIVACY POLICY NOTICE

Welcome to our website and portal system. **Araba Technologies Ltd** Araba Technologies Ltd (ARABATECH) is an emerging technology solution provider focused on using new technologies to tackle developmental challenges in Nigeria and across Africa.

Our portfolios focus on the following key priorities in our operations:

- Digital solar and intelligence power systems
- Digital hardware and infrastructures
- Development of digital currency, trade services, and e-commerce platform
- Clean Energy Distribution Infrastructure (CEDI)
- Digital Security Devices and Infrastructures
- Web-Infrastructural Development
- Data Centre and Cloud-Hosting Service
- Digital Imaging & Diagnostics Devices & Equipment
- AI-Powered Infrastructure Intelligence System



- E-Learning & Education Technology & Infrastructure
- Smart IoT Devices & Automation Systems
- AI-Powered Smart Park & Value-Added Services
- Autonomous & Smart Vehicles
- Allied Information and Communication Technology Services

✚ With a proven track record of success, ARABATECH collaborates on various technology initiatives and provides expertise in technology investments and development solutions. The company serves governmental organisations, corporations, and international bodies in Nigeria and the rest of Africa.

✚ Arabatech is an incorporated Limited Liability Company registered under the Corporate Affairs Commission, Companies and Allied Matters Act, 2020. ARABATECH collects and processes data in furtherance of service interest and the legitimate interest of our stakeholders and visitors to our website i.e., data subjects in line with the provisions and guidelines of the Nigeria Data Protection Act 2023 (NDPA 2023) and Nigeria Data Protection Regulation (NDPR2019) and related Data Protection and Privacy Laws.

✚ We collect and process various categories of your data based on the type of engagement we have with you.



- ✚ We use Cookies, which are small files stored on a user's computer. Cookies hold a modest amount of data specific to you and our website and can be accessed either by the web server or by your computer. They are also embedded applications or codes on our website that may be used to process your pattern of interaction with our website and thereby create automated responses and notifications that seem most likely to suit your interests.
- ✚ We encourage you to **Click and Read Carefully our DATA PRIVACY POLICY**; please note that this notice applies to all ARABATECH services hosted online, including service and our partner intervention brands, including other future services/interventions that will be hosted online, our online meetings and interactions with our stakeholders and visitors to our sites.
- ✚ We consider and accept your continued interaction and engagement with our websites and portals as your **CONSENT** to collect and process your personal data in line with our legitimate business interest subject to the provisions and requirements of Nigeria Data Protection Regulation (NPDR) subject to Nigeria Data Protection Act 2023, and related international data protection and privacy laws.



ARABATECH DATA PRIVACY POLICY

1.0. OUR GUIDING PRINCIPLES FOR DATA PROCESSING

In processing your personal data, we adhere strictly to the principles of data processing as set out in Article 2.1 of the GDPR. Thus, we shall ensure that Personal Data shall only be:

- a) Collected and processed in accordance with specific, legitimate and lawful purpose consented to by the Data Subject.
- b) Adequate, accurate, and without prejudice to the dignity of the human person.
- c) Stored only for the period within which it is reasonably needed; and
- d) Secured against all foreseeable hazards and breaches such as theft, cyber attack, viral attack, dissemination, manipulations of any kind, damage by rain, fire, or exposure to other natural elements.

2.0 CONSENT OF DATA SUBJECT

Except as otherwise required by the operation of law or principles of law, your consent as the Data Subject is the entry point for our data collection and processing. You have the right to give, withhold or otherwise withdraw your consent to data processing. For further understanding of the operation of the principle of consent under data processing, see Articles 2.1(a), 2.2, 2.3, and 2.4 of the GDPR. Those seeking information on our website or other platforms shall be deemed to have given constructive consent to receiving information of specific or general nature through us from time to time.



3.0 OUR SCOPE OF DATA PROCESSING

In varying degrees vis-à-vis the service, we provide for you or your level of engagement with us, we do process your personal data. Below is a table containing the major types of personal data, the purpose and the lawful basis for processing them:

S/N	PURPOSE OF COLLECTION	TYPE OF DATA	LAWFUL BASIS
1	REGISTRATION & KNOW YOUR CUSTOMER PURPOSE	Name, Phone, Email Address, Contact Address, National Identity Number, International passport number, location, Sex, Date of Birth, passport and educational record, including those requested by government regulating agencies such as Central Bank of Nigeria for eNaira onboarding	To provide public service to data subjects as requested by the Central Bank of Nigeria and legitimate partners

S/N	PURPOSE OF COLLECTION	TYPE OF DATA	LAWFUL BASIS
		and related public organisations work with us.	
2	NOTIFICATIONS	Name, Phone, Email Address, Contact Address, Sex, and Date of Birth.	To provide public service to data subjects in with our mandates and legitimate partners.
3	DATA ANALYTICS	Name, Phone, Email Address, Contact Address, Sex, and Date of Birth.	To ensure that our services suit the purpose of data subjects and to measure our performance
4	SECURITY	Name, Phone, Email Address, Contact Address, Sex, Date of Birth, and passport.	For the safety and security of lives and property.
5	PARTNERSHIP /EMPLOYMENT	Name, Phone, Email Address, Contact Address, location, Sex, Date of Birth,	For due diligence



S/N	PURPOSE OF COLLECTION	TYPE OF DATA	LAWFUL BASIS
		passport, medical record, and educational record.	
6	CONTRACT	Name, Phone, Email Address, Contact Address, Sex,	For due diligence

Please note that the categories of data and the lawful basis provided are not exhaustive. We are governed by Nigeria's laws on personal privacy and related directives, including its implementation guidelines for partners and the requirement for consent in all circumstances.

4.0 RIGHTS OF DATA SUBJECTS

We hold your privacy rights very dear to our operations. Apart from giving, withholding or withdrawing consent, you have the right to all relevant information that may guide you in making informed decisions about your personal data. For example, you have the right to be notified of anyone or any place to which we may transfer your personal data. Your rights under the NDPR include but are not limited to the following:

- a) right to data portability,



- b) right to erasure,
- c) right to limit processing and
- d) right to obtain your data.

See Part 3 of the NDPR for details of the rights of data subjects.

5.0 WITHHOLDING RELEVANT DATA

There are types of personal data that are mandatory for us to process in order carry out your instruction or perform our legal mandate for your benefit. If you withhold such information, it may be impracticable to carry out our mandate in relation to you. If you seek more clarification on our data processing contact our designated Data Protection Officer as provided in section 12 below.

6.0. TRANSFER OF DATA TO A THIRD PARTY

As a non-governmental commercial entity, third parties may wish to provide opportunities on our platform for mutual benefits or in general interest related to our service/intervention. The type of data usually processed for this may be your digital contacts such as e-mail, telephone number, or address; you have the right to decline such third-party offers



and further restrict the processing of your personal data. You can simply unsubscribe to the notices sent for the purpose of the offers.

7.0 TECHNICAL INFORMATION

Websites are typically designed to collect certain information from visitors. Our website is also designed to collect your IP address and other information that your web browser typically shares with the websites you visit. This aims to know you better and engage with you automatically and dynamically through your actions on our website.

8.0 PERSONAL DATA SECURITY AND INTEGRITY

We use cutting-edge technologies and foolproof protocols to provide you with comprehensive layers of security in personal data. Thus, we are constantly vigilant in preventing cyber-attacks, fraudulent intrusion, unauthorised access, and loss or corruption of personal data using our best efforts. We are equally conscious of the obligations imposed on us by law regarding data protection. Accordingly, we conduct reviews of process and privacy impact assessment, carry out trainings and obtain strict warranties where applicable.



9.0 PURPOSE AND STORAGE LIMITATION

The purpose of data processing usually determines the length of time within which your personal data is stored with us and the residue of data actually stored for this purpose. In addition, we collect and store personal data that is reasonably required by law or best practice to serve you or respond to legitimate enquiries about our transaction with you. We take this responsibility very seriously in the knowledge that you need to enjoy your privacy as guaranteed under the 1999 Constitution of the Federal Republic of Nigeria and international human rights law.

10.0 WEBSITE LINKS:

Our website may contain links to other websites. Save, and except as otherwise expressly stated by us, any link to another website is not covered by our privacy policy. We strongly advise that you should satisfy yourself with the details of any privacy policy provided on other websites or links.

11.0 TRANSFER TO THIRD PARTIES AND COUNTRIES

In carrying out our mandate effectively, we may require the services of third parties who may be within or outside the NDPR jurisdiction (Nigeria). Examples of such services include but are not limited to the following:

- a) Internet connectivity,
- b) cloud hosting and storage,



- c) data analytics,
- d) data security,
- e) software development,
- f) Domain registration and
- f) Legitimate Public interest.

In transferring your data to third parties, we shall be guided by extant public policy and the NDPR regarding the adequacy level of foreign jurisdictions. See PART 2 Article 2.11 and PART 3 under the NDPR for details of your right under this section.

12.0 USE OF SPECIAL DATA PROCESSING CODES (COOKIES)

“Cookies,” in computer parlance, are text files that are downloaded to your browsing devices such as phones or computers when you browse pages of websites. They contain small amounts of data, and their essential function is to intelligently memorize your preferences and present them to you as choices when browsing – even at different times. Note that various websites use cookies for different purposes some of which may undermine your privacy rights. We have taken measures to ensure that all methods we adopt to engage automatically with you do not violate your privacy rights under the NDPR. In the case of cookies, we ensure that they have security protocols and are not vulnerable to abuse by anyone.



13.0 ARABATECH DATA PRIVACY OFFICER (DPO)

We have provided a desk to respond promptly and satisfactorily to all your requests, suggestions, and complaints. This is called the DPO. Our DPO is responsible for prompt action on your data privacy. Contact the ARABATECH via this email:

info@arabatech.com

Our DPO serves as the internal mechanism to carry out the following services amongst others:

- Data protection regulations compliance and breach services
- Data protection and privacy advisory services
- Data protection capacity building
- Data Regulations Contracts drafting and advisory
- Data protection and privacy breach remediation planning and support services
- Information privacy audit
- Data privacy breach impact assessment
- Data Protection and Privacy Due Diligence Investigation
- Data Protection Officer

14.0 REMEDIATION



Our data subjects are encouraged to report any complaint or concern about their data privacy through the DPO unit. Our team at the DPO unit will take action within 24 hours to redress any grievance.

15.0 ALTERATION OF PRIVACY POLICY

ARABATECH reserves the right to alter the foregoing policy with or without notice to advance data privacy rights and public interest or comply with lawful directives of the Federal Government.