



Data Protection

Privacy Notice

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1 Privacy Notice

1.1 Who We Are

BIOSEC SOLUTIONS (*hereafter referred to as the Company*) gather and process your personal information in accordance with this privacy notice and in compliance with the EU General Data Protection Regulation (EU GDPR) and relevant laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

The Company's registered office is at 15 Mekong, Maitama Abuja, Nigeria and we are a company registered in Nigeria under company number RC 901419.

We have designated an EU Representative / Data Protection Officer, and registered under the Data Protection Authority, Brussels Belgium, as required by the EU GDPR. Our DPO can be contacted at dpo@biosec.com.ng

1.2 Information That We Collect

The Company processes your personal information to meet our legal, statutory and contractual obligations, and to provide you with our products and services. We will not collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The personal data that we collect from is: -

- Name
- Date of Birth
- Home Address
- Personal Email
- Business Email
- Home Telephone Number
- Mobile Telephone Number
- National Insurance Number
- Passport Number
- Driver's License Number
- Country of Residence
- State of Residence
- Country of Origin
- State of Origin
- Demographic Information
- Special Category Data (see our Data Protection Policy for definition of Special Category Data)

We collect information in the below ways: -

- Online forms
- Website Orders
- Employment CVs

1.3 How We Use Your Personal Data

BIOSEC SOLUTIONS takes your privacy very seriously and will not disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below: -

- We collect your personal data in the pursuance of the enrolment of Nigerians resident in the Diaspora for the national identity program of the Federal Republic of Nigeria

1.4 Your Rights

You have the right to access any personal information that the Company processes about you and to request information about: -

- What personal data we hold about you
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from you, information about the source

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us; to exercise your data portability rights, and to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

We will strive to correct or to act according to your request as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

1.5 Sharing and Disclosing Your Personal Information

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this notice or where there is a legal requirement. The Company sometimes use third-parties to provide some services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with this privacy notice, our data protection policy and any other appropriate confidentiality and security measures.

The below company is our processor that processes data on our behalf for the specific purpose stated. They may process your data if your transactions with us involve the stated purpose.

Paystack Limited

We use Paystack Ltd to enable online financial transactions and they act in the capacity of a processor on our behalf. The only information we provide them with is your email and phone number to meet business and legal requirements.

For more information about Paystack Ltd, please read their Privacy Notice at <https://www.paystack.com>

1.6 Safeguarding Measures

The Company takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place. Please, consult our Data Protection Policy document at [<https://idcard.ng/privacy>] or request a copy at [info@idcard.ng] or [15 Mekong Crescent, Maitama-Abuja, Nigeria]. Some of these measures are [SSL, TLS, encryptions, pseudonymisation, restricted access, IT authentication, firewalls, anti-virus/malware etc.]

1.7 Transfer of Personal Data

We process personal data according to the EU GDPR and we know that some other countries do not have the same high standard of protection for personal data. The Company does not transfer your personal data without your consent to organisations that do not meet the EU GDPR requirements.

The Company utilise some products or services (*or parts of them*) that may be hosted, transmitted, transported or stored in a different country, which means that we may transfer any information which is submitted by you through the website and online services.

Therefore, when you use our website/send us an email/sign up to our newsletter, etc., the personal information you submit may be stored on servers which are hosted in a different Country. Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your information and abide by strict agreements and measures set out by the Company to protect your data and comply with the relevant data protection laws.

1.8 Consequences of Not Providing Your Data

You are not obligated to provide your personal information to the Company, however, as this information is required for us to provide you with our services and for your legitimate interests, we will not be able to offer some/all our services to you without you providing the requested information.

1.9 Legitimate Interests

As noted in the *'How We Use Your Personal Data'* section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests, ensuring that they are proportionate and appropriate.

1.10 How Long We Keep Your Data

The Company only ever retains personal information for as long as is necessary or required by Law. We have strict review and retention policies in place to meet these obligations and the minimum allowable period after which time it will be destroyed.

1.11 Special Categories Data (if applicable)

Owing to the services or treatments that we offer, the Company sometimes needs to process sensitive personal information/special category data about you in the pursuance of the enrolment of citizens of Nigeria, resident in Nigeria or in the Diaspora. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

Where we rely on your consent for processing special category data, we will obtain your explicit consent through an explicit consent mechanism. You can modify or withdraw consent at any time, which we will act on immediately, unless there is a legitimate or legal reason for not doing so.

See or request our Data Protection Policy for definition of Sensitive Personal Information or Special Category Data.

1.12 Applicability

This Privacy Notice is applicable, for all intent, purposes, rights and obligations, to the processing of personal data of data subjects that fall under the EU GDPR. However, data subjects and users of our services that are not covered by the GDPR may, directly or indirectly and without any legal right or claim, enjoy the benefits of the measures that we have put in place.

1.13 Lodging A Complaint

The Company only processes your personal information in compliance with this privacy notice and in accordance with the EU General Data Protection Regulation (EU GDPR) and relevant laws. If, however you wish to raise a

complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint at the contact details below.

DPO

dpo@biosec.com.ng

Tel: +32475600856

OR

The Gegevensbeschermingautoriteit / Commission de la protection de la vie privée / Data Protection Authority,

Drukpersstraat 35 / Rue de la Presse 35

1000 Bruxelles

Tel. +32 2 274 48 00

Fax +32 2 274 48 35

e-mail: contact@apd-gba.be; commission@privacycommission.be

Website:

<https://www.gegevensbeschermingsautoriteit.be/contact>

<https://www.autoriteprotectiondonnees.be/contact>

<http://www.privacycommission.be/>