

THISTLEPRAXIS CONSULTING LIMITED PRIVACY POLICY

This privacy statement explains what information we gather about you, what we use such information for and to whom we give the information. It also sets out the rights of our client in relation to information and who you can contact for more information or queries. Click on the links below to take you to the more detailed section of this statement.

1.0 YOUR PRIVACY RIGHTS

This Privacy Policy describes your rights regarding our collection, use, storage, sharing and protection of your personal information. It applies to ThistlePraxis Consulting website and all database applications, services, tools and physical contact with us regardless of how you access or use them.

You have various rights in relation to your personal information. In particular, you have a right to:

- Request confirmation that we are processing your personal information and request a copy of the personal information we hold about you
- Request that we update the personal information we hold about you, or correct such personal information that you think is incorrect or incomplete
- Request that we delete personal information that we hold about you, or restrict the way in which we use such personal information
- Object to our processing of your personal information.
- To exercise any of your rights, or if you have any other questions about our use of your personal information, please contact us.

2.0 CONSENT

You accept this Privacy Policy when you give consent upon access to our platforms, or use our services, content, features, technologies or functions offered on our website, digital platforms or visit any of our offices for official or non-official purposes (collectively “ThistlePraxis Consulting services”). This Policy governs the use of ThistlePraxis Consulting services and intervention projects by our users and stakeholders unless otherwise agreed through written contract. This Privacy Policy may be amended at any time and such amendments, shall be posted on our website, or placing such notice at conspicuous points at our office facilities. All amendments shall take effect 7 days after publication.

3.0 YOUR PERSONAL INFORMATION

When you use ThistlePraxis Consulting Services, we collect information sent to us by your computer, mobile phone or other electronic access device. The automatically collected information includes but not limited to- data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, standard web log data, still and moving images.

We may also collect any information you provide us including but not limited to- information on web form, survey responses, account update information, email, phone number, organization you represent, official position, correspondence with ThistlePraxis Consulting support services and all forms of telecommunication with ThistlePraxis Consulting. We may also collect information about your transactions, enquiries and your activities on our platform or premises.

We may also use information provided by third parties like social media sites. Information about you provided by other sites are not controlled by ThistlePraxis Consulting and we are therefore not liable for how such information is used.

4.0 WHAT WE DO WITH YOUR PERSONAL INFORMATION

The purpose of our collecting your personal information is to give you efficient, enjoyable and secure service. We may use your information to:

- Provide ThistlePraxis Consulting services and support;
- Process applications and send notices about your transactions to requisite parties;
- Verify your identity;
- Resolve disputes, collect fees, and troubleshoot problems;
- Manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities;
- Detect, prevent or remediate violation of Laws, Regulations, Standards, Guidelines and Frameworks;
- Improve ThistlePraxis Consulting Services by implementing aggregate customer or user preferences;
- Measure the performance of the ThistlePraxis Consulting Services and improve content, technology and layout;
- Track information breach and remediate such identified breaches;
- Manage and protect our information technology and physical infrastructure;
- Contact you at any time through your provided telephone number, email address or other contact details.

5.0 COOKIES

Cookies are small files placed on your computer's hard drive that enables the website to identify your computer as you view different pages. Cookies allow websites and applications to store your preferences in order to present contents, options or functions that are specific to you. Like most interactive websites, our website uses cookies to enable the tracking of your activity for the duration of a session. Our website uses only encrypted session cookies which are erased either after a predefined timeout period or once the user logs out of the platform and closes the browser. Session cookies do not collect information from the user's computer. They will typically store information in the form of a session identification that does not personally identify the user.

6.0 HOW WE PROTECT YOUR PERSONAL INFORMATION

We store and process your personal information on our computers in Nigeria. Where we need to transfer your data to another country, such country must have an adequate data protection law. We will seek your consent where we need to send your data to a country without an adequate data protection law. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls.

7.0 HOW WE SHARE YOUR INFORMATION WITHIN THISTLEPRAXIS CONSULTING AND OTHER USERS

During your interaction with our website or premises, we may provide other Ministries, Departments, Agencies (MDA), other organs of government, private sector operators performing government

functions, with information such as your name, contact details, or other details you provide us for the purpose of performing our statutory mandate to you or third parties.

We work with third parties, especially government agencies to perform ThistlePraxis Consulting services and implement its mandate. In doing so, a third party may share information about you with us, such as your email address or mobile phone number.

You accept that your pictures and testimonials on all social media platforms about ThistlePraxis Consulting can be used for unlimited promotional purposes by us. This does not include your trademark or copyrighted materials.

From time to time we may send you relevant information such as news items, enforcement notice, statutorily mandated notices and essential information to aid the implementation of our mandate. We may also share your personal information in compliance with National or international laws; crime prevention and risk management agencies and service providers.

8.0 DATA CONFIDENTIALITY RIGHTS

Your information is regarded as confidential and will not be divulged to any third party except under legal and/or regulatory conditions as well as in delivering our services and related benefits to you, either solely or partnership with other service providers . You have the right to request sight of, and copies of any and all information we keep on you, if such requests are made in compliance with the Freedom of Information Act and other relevant enactments. While NITDA is responsible for safeguarding the information entrusted to us, your role in fulfilling confidentiality duties includes, but is not limited to, adopting and enforcing appropriate security measures such as non-sharing of passwords and other platform login details, adherence with physical security protocols on our premises, dealing with only authorized officers of the Agency.

9.0 LINKS TO OTHER WEBSITES AND PREMISES

Certain transaction processing channels may require links to other websites or Organisations other than ours. Please note that ThistlePraxis Consulting is not responsible and has no control over websites outside its domain. We do not monitor or review the content of other party's websites which are linked from our website or media platforms. Opinions expressed or materials appearing on such websites are not necessarily shared or endorsed by us, and ThistlePraxis Consulting should not be regarded as the publisher of such opinions or materials. Please be aware that we are not responsible for the privacy practices, or content of these sites. We encourage our users to be aware of when they leave our site and to read the privacy statements of these sites. You should evaluate the security and trustworthiness of any other site connected to this site or accessed through this site yourself, before disclosing any personal information to them. ThistlePraxis Consulting will not accept any responsibility for any loss or damage in whatever manner, howsoever caused, resulting from your disclosure to third parties of personal information.

10.0 GOVERNING LAW

This Privacy Policy is made pursuant to the Nigeria Data Protection Regulation (2019) and other relevant Nigerian laws, regulations or international conventions applicable to Nigeria. Where any provision of this Policy is deemed inconsistent with a law, regulation or convention, such provision shall be subject to the overriding law, regulation, or convention.