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DATA PROTECTION POLICY

Introduction

At CESEL, we recognize the importance of protecting the privacy and confidentiality of personal and sensitive information. This policy outlines our commitment to complying with relevant data protection laws and regulations in Nigeria and safeguarding the personal data of our employees, customers, partners, and other stakeholders.

Scope

This policy applies to all personal data collected, processed, stored, or transmitted by CESEL, whether in electronic or physical form. It covers data processing activities carried out by employees, contractors, third-party service providers, and any other entities acting on behalf of the company.

Principles of Data Protection

1. **Lawfulness, Fairness, and Transparency**:

Personal data will be processed lawfully, fairly, and transparently in accordance with applicable data protection laws and regulations.

Individuals will be informed of the purposes and legal basis for processing their personal data.

2. **Purpose Limitation**:

Personal data will be collected for specified, explicit, and legitimate purposes and will not be processed in a manner incompatible with those purposes.

3. **Data Minimization**:

Only the minimum amount of personal data necessary for the intended purposes will be collected, processed, and retained.

Unnecessary or redundant data will not be collected or retained.

4. **Accuracy**:

Reasonable steps will be taken to ensure that personal data is accurate, complete, and up-to-date.

Data subjects have the right to request correction of inaccuracies in their personal data.

5. **Storage Limitation**:

Personal data will be retained only for as long as necessary to fulfill the purposes for which it was collected, or as required by law.

6. **Integrity and Confidentiality**:

Appropriate technical and organizational measures will be implemented to ensure the security, integrity, and confidentiality of personal data. Access to personal data will be restricted to authorized individuals on a need-to-know basis.

7. **Accountability**:

CESEL will be responsible and accountable for complying with data protection laws and regulations. Data protection responsibilities will be clearly assigned, and employees will receive training on their obligations.

Data Collection and Processing

1. **Lawful Basis for Processing**:

Personal data will be processed only when one or more lawful bases for processing exist, such as consent, contract performance, legal obligation, vital interests, or legitimate interests.

2. **Consent**:

Where consent is required for the processing of personal data, it will be obtained freely, explicitly, and unambiguously from the data subject. Data subjects have the right to withdraw their consent at any time.

3. **Data Security**:

Personal data will be protected against unauthorized or unlawful processing, accidental loss, destruction, or damage, using appropriate technical and organizational measures.

4. **International Data Transfers**:

Personal data will not be transferred to countries outside Nigeria unless adequate data protection safeguards are in place, as required by law.

Data Subject Rights

1. **Access and Rectification**:

Data subjects have the right to access their personal data and request correction, amendment, or deletion of inaccurate or incomplete information.

2. **Data Portability**:

Data subjects have the right to receive their personal data in a structured, commonly used, and machine-readable format and to transmit it to another controller, where technically feasible.

3. **Objection and Restriction**:

Data subjects have the right to object to the processing of their personal data in certain circumstances and to request restriction of processing while disputes are being resolved.

4. **Automated Decision Making and Profiling**:

Data subjects have the right not to be subject to solely automated decision making, including profiling, which produces legal effects concerning them or similarly significantly affects them, unless certain conditions are met.

Data Breach Management

1. **Reporting**:

All data breaches, actual or suspected, will be promptly reported to the Data Protection Officer (DPO) or designated data protection authority, as required by law.

Data subjects will be notified of breaches that are likely to result in a high risk to their rights and freedoms.

2. **Investigation and Response**:

Data breaches will be investigated promptly, and appropriate measures will be taken to mitigate any adverse effects and prevent recurrence.

Training and Awareness

1. **Employee Training**:

All employees will receive training on data protection laws, regulations, and company policies relevant to their roles.

Training will emphasize the importance of safeguarding personal data and the procedures for ensuring compliance.

Compliance and Review

1. **Compliance Monitoring**:

Compliance with this data protection policy will be monitored regularly through audits, assessments, and reviews.

Non-compliance issues will be addressed promptly and corrective actions will be implemented.

2. **Policy Review**:

This data protection policy will be reviewed periodically to ensure its effectiveness, relevance, and compliance with evolving legal and regulatory requirements.

Updates and revisions will be made as necessary to reflect changes in the business environment and best practices.

Dated: 10th of December 2023.

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Dr. Patrick Tolani
CEO