



GENISERVE WEBSITE PRIVACY NOTICE

Effective Date: [Insert date]

Last Updated: [Insert date]

1. Introduction

Geniserve Ltd respects your privacy and is committed to protecting personal information collected through its website.

This Privacy Notice explains the information we collect, why we collect it, how we use and protect it, and the rights available to you.

This notice has been prepared with consideration for the Nigeria Data Protection Act 2023, applicable guidance issued by the Nigeria Data Protection Commission and the General Data Protection Regulation where it applies.

2. Information We Collect

When you submit an enquiry through the Contact Us form, we may collect:

- your name;
- your email address;
- the subject of your enquiry; and
- the information contained in your comment or message.

Please do not include sensitive personal information in your message unless it is necessary and specifically requested by Geniserve.

Geniserve does not collect CVs or employment applications through its website.

The website hosting and maintenance systems may automatically process limited technical information necessary to deliver, maintain and secure the website, such as IP addresses and basic security logs.

3. Why We Collect Your Information

We use information submitted through the website to:

- identify and communicate with you;
- respond to your enquiry;
- provide information about our services;
- understand the nature of your request;
- follow up on your enquiry; and
- maintain an appropriate record of our communication.

We shall not use your personal information for an unrelated purpose without an appropriate lawful basis and, where required, further notice.

4. Lawful Basis for Processing

Geniserve may process your personal information because:



- it is necessary to respond to an enquiry you have initiated;
- it may be necessary to take steps at your request before entering into a contract; or
- Geniserve has a legitimate interest in responding to business enquiries and maintaining appropriate business communications.

Where consent is required by applicable law, we will request it clearly, and you may withdraw it at any time.

5. How We Protect Your Information

Geniserve applies reasonable technical and organizational measures to protect personal information against unauthorized access, use, disclosure, alteration, loss or destruction.

These measures include:

- restricting access to authorized personnel;
- using approved Microsoft 365 services;
- applying multifactor authentication;
- protecting company devices;
- maintaining confidentiality requirements; and
- providing information-security and privacy awareness to personnel.

No method of internet transmission or electronic storage is completely secure. This does not limit Geniserve's legal responsibilities to apply appropriate safeguards and respond to identified risks.

6. Sharing Your Information

Geniserve does not sell your personal information.

Information submitted through the website may be accessed by authorized Geniserve personnel who require it to respond to your enquiry.

Approved service providers, including the website hosting or maintenance provider and Microsoft 365, may have limited or incidental technical access where necessary to provide their services. Such access shall not permit the provider to use the information for its own purposes and shall be subject to appropriate confidentiality, privacy, security and contractual requirements.

Geniserve may disclose personal information where required by law, court order or a properly authorized regulatory, judicial or law-enforcement authority.

7. International Processing

Some approved cloud or website service providers may process or store information outside Nigeria.

Where an international transfer is subject to data-protection restrictions, Geniserve shall apply an appropriate legal transfer mechanism and reasonable contractual, technical and organizational safeguards.

8. Data Retention

Geniserve will retain your name, email address, subject and enquiry only for as long as reasonably necessary to respond to and follow up on your request, and thereafter only for any period required or permitted by applicable law, contractual obligations or the establishment, exercise or defence of legal claims, after which the information will be securely deleted or anonymized.

9. Cookies

- Geniserve may use cookies that are strictly necessary for the website to function securely and correctly.
- If Geniserve uses non-essential analytics, marketing or tracking cookies, appropriate information and a consent choice will be provided where required by law.
- Geniserve does not use information submitted through the Contact Us form for behavioural advertising.
- You may manage cookies through your browser settings. Disabling strictly necessary cookies may affect the operation of some website functions.

10. Social Media and Third-Party Links

Our website contains links to Geniserve's LinkedIn and Instagram pages. When you follow these links, you leave the Geniserve website, and the relevant social-media platform may collect and process your personal information in accordance with its own privacy and cookie policies.

Geniserve does not control the privacy practices of these independent platforms, and you should review their privacy notices before interacting with them.

Geniserve's LinkedIn and Instagram icons operate as links to external platforms. If additional social-media tracking or embedded technologies are used, this Privacy Notice and applicable cookie controls will be updated in accordance with legal requirements.

The website may also contain links to other third-party websites. This Privacy Notice does not apply to independent third-party websites, and a link does not necessarily constitute Geniserve's endorsement of the third party or its privacy practices.

11. Your Privacy Rights

Subject to applicable law and any lawful limitations, you may have the right to:

- know how your personal information is being used;
- request access to your personal information;
- request correction of inaccurate or incomplete information;
- request deletion of your information;
- request restriction of processing;
- object to processing based on legitimate interests;
- withdraw consent where processing is based on consent;
- request transfer of your information where applicable; and



- lodge a complaint with the appropriate data-protection authority.

Geniserve may retain certain information where required by law, necessary for legal claims or otherwise permitted by applicable law.

12. How to Exercise Your Rights

To exercise a privacy right or ask a question about your personal information, contact:

Data Protection Officer/Quality and Compliance Manager

Email: info@geniserve.net

Lagos Telephone: 08050480000, 09137000601 or +234 1 290 4865

Accra Telephone: +233 26 600 0736

Geniserve may request reasonable information to confirm your identity before disclosing, correcting or deleting personal information. We will respond without undue delay and within the period required by applicable law.

13. Complaints

If you have a concern about how Geniserve processes your personal information, please contact the Data Protection Officer/Quality and Compliance Manager so that we can investigate and respond.

You may also submit a complaint to the:

Nigeria Data Protection Commission

Website: <https://ndpc.gov.ng>

Where the GDPR applies, you may also complain to the relevant data-protection supervisory authority in the country where you live, work or believe a violation occurred.

We encourage you to contact Geniserve so that we can investigate your concern. You may also lodge a complaint directly with the applicable data-protection authority and exercise any other rights available under applicable law.

14. Children's Information

The Geniserve website and services are intended for business and professional users and are not directed toward children.

Geniserve does not knowingly collect children's personal information through its website enquiry form. If you believe that a child has submitted personal information through the website, please contact us so that we can assess the circumstances and take appropriate action.

15. Changes to This Privacy Notice

Geniserve may update this Privacy Notice to reflect changes in:

- the website;
- business activities;



- service providers;
- legal or regulatory requirements; or
- privacy and security practices.

The revised notice will be published on the website with an updated effective date.

16. Contact Information

Geniserve Ltd

Lagos Office:

34A Oduduwa Way, GRA, Ikeja, Lagos, Nigeria

Accra Office:

HNO. 2A Yoomo Naana Lane, East Legon, Accra, Ghana

Email: info@geniserve.net

Lagos Telephone:

08050480000

09137000601

+234 1 290 4865

Accra Telephone:

+233 26 600 0736

Privacy Contact:

Data Protection Officer/Quality and Compliance Manager

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