

# VOTA PRIVACY POLICY

## General guidelines

- This Privacy Policy indicates that we are dedicated to and responsible for processing the information of our customers, stakeholders, employees and other interested parties with absolute caution and confidentiality.
- This policy describes how we collect, store, handle and secure our data fairly, transparently, and with confidentiality.
- This policy ensures that Chams follows good practices to protect the data gathered from its customers.
- Chams shall collect and process Personal data in accordance with specific, legitimate and lawful purpose consented to by the Data Subject.
- Chams shall make known the purpose of collection of data to the Data Subject will ensure not to obtain information by fraud, coercion or undue influence.
- Chams shall not share Personal Data informally or disclosed to unauthorized people, within the company or externally.
- Chams shall not violate the rights of the data subject but ensure to protect the fundamental rights of the data subject and other rights under the Nigerian laws.
- Transfer of information of the data subject shall be in accordance with the NDPR.
- To emphasize the need for transparency over the usage of personal data, Chams ensure fair processing of information typically through this privacy policy.

## Definitions

- **Personal data** is defined as “Any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.
- **Data subject** is defined as “Data Subject means an identifiable person; one who can be identified directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity”
- **NDPR** is defined as “Nigeria Data Protection Regulation”

### **What are the rights of the data subject?**

- A data subject has the right to be informed of the processing of personal data in a concise, transparent and accessible form appropriate safeguards for data protection. Data subject is responsible for making sure the information provided to Chams is accurate and should inform the Chams on any changes as it occurs to enable Chams update the personal information.
- The data subject has right to lodge complain with respect to the processing of his/her personal data.
- Data subject has the right to access information Chams holds, access their personal data and other supplementary information and obtain information about how we process it
- Data subject has the right to object to or restrict processing by blocking or withdrawing consent to processing information. When processing is restricted, Chams may store the personal data, but not further process it.
- Data subject has the right to have inaccurate or incomplete personal data rectified. If this personal data in question has been disclosed to third parties, they must be informed of the rectification where possible. Chams must also inform the data subject about the third parties to whom the data has been disclosed where appropriate.
- Data subject has the right to request the deletion or removal of personal data where there is no compelling legal or regulatory requirement for its continued processing. Chams will make sure that this right is protected.
- Chams will ensure that personal data is moved, copied or transferred easily from one IT environment to another in a safe and secure way, without hindrance to usability.
- Chams shall ensure that the rights of the data subject shall be in conformity with constitutionally guaranteed principles of law for the general protection and enforcement of fundamental rights.

### **How do we share personal data with third party?**

- Chams in efforts to provide excellent products and services may need to outsource its product delivery, this will be done in line with relevant regulations and law.
- Chams may share personal information of data subject with a third party by executing a third-party processing contract in order to provide the quality of services requested by the data subject.
- Chams may also share personal data where there is a public or legal duty to do so, when it is needed to conclude regulatory reporting and when Chams has requested and received the permission of the data subject to share it.

### **What constitutes the data subject's consent?**

- Consent is given when a data subject indicates or agrees through a statement or by a clear affirmative action, to the processing of personal data relating to him or her by his organization

for electronic voting purposes. Chams will only use the information of the data subject when the consent has been provided or when the Company is required to do so by law.

#### **What personal information do we collect?**

When the data subject provides the following information:

- personal details e.g. Gender, First, middle & last name
- contact information such as email address
- phone or mobile numbers

#### **Why do we collect personal information?**

- Personal Data is collected for the purpose of providing the electronic voting services requested by the data subject's organization. There is need to collect personal data for identification, verification and voter's validation on VOTA.
- Chams is committed to ensuring that the information collected and used are specific and appropriate for the electronic voting purpose and does not constitute an invasion of user's privacy.
- Password information are in encrypted form and is not in readable format on Chams database server.

#### **How do we collect personal information?**

- We collect information from the organizations intending to conduct electronic voting for its members only via electronic means which may include, email, API, or database access.
- Physical copies are signed and documented only for legal reasons and proofs of business engagement.

#### **How is data secured?**

- Chams ensures to secure personal data through firewalls and use of data encryption technologies. Information shall be secured against all foreseeable hazards and breaches such as theft, cyberattack, viral attack, dissemination, manipulations of any kind, damage by rain, fire or exposure to other natural elements.
- Chams ensures the continuous capacity building for staff in the area of data security.

#### **Policy Review**

This Privacy Policy will be subject to review and update from time to time as deemed necessary by the Board and also in line with the NDPR as it may be reviewed from time to time.

#### **Contact**

If you would like further information on anything included in this Privacy Policy, contact us at **Plot 8, Louis Solomon Street, Off Ahmadu Bello Way, Victoria Island Lagos, [info@Chamsplc.com](mailto:info@Chamsplc.com)**

This Privacy Notice may be updated from time to time and the most recent version can be found on [www.Chamsplc.com](http://www.Chamsplc.com)