

**MULTIPRO - ONLINE
PRIVACY POLICY**

Introduction

Multipro Consumer Products Limited ("Multipro" we, "us" or "our") respects your privacy and is committed to protecting your personal data. This privacy policy contains information on how we look after your personal data and inform you of your privacy rights and how the law protects you.

It also identifies the data we collect from you, why we collect your data, how we use your data, how you can control your data and how we manage, store, protect or share your data.

We have provided this document in a layered format so you can easily navigate to the specific areas set out below. Alternatively, you can download a pdf version of the policy here: [LINK].

1. Purpose of this Privacy Policy.....	1
2. What data do we collect about you?.....	2
3. How is your personal data collected?.....	2
4. Lawful basis for our use of your personal data.....	2
5. Why we use your data.....	3
6. Failure to provide data.....	3
7. Marketing Communications.....	Error! Bookmark not defined.
8. Change of purpose.....	3
9. Disclosures of your personal data.....	4
10. International transfers.....	4
11. Data security.....	4
12. How long will you use my personal data for?.....	5
13. Your legal rights.....	5
14. Contact details.....	5
15. Changes to the privacy policy and your duty to inform us of changes.....	6

1. Purpose of this Privacy Policy

This policy provides you with information on how Multipro collects and processes your personal data when you use this website, our services or interact with us in any other way.

This privacy policy is not intended for children. We do not provide services or undertake business with children, and we do not knowingly collect data relating to children, except where we collect data of dependents, next-of-kin, or in other representative capacity for purposes related to our business. In such instances, we deal directly with adult representatives.

2. What data do we collect about you?

The data we collect from you is personal data. Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect, use, store specific types of personal data we may collect are as follows:

- *Identity Data*: includes data such as first name, maiden name, last name, social media username or similar identifier, marital status, title, date of birth, next-of-kin data, biometric data and gender.
- *Contact Data*: includes data such as home address, email address and telephone number.
- *Financial Data*: includes data such as salary structure, bank information and payment information.
- *Transaction Data*: includes data such as details about payments to and from you and other details of products and services you have purchased from us.
- *Marketing and Communication Data*: includes data such as regarding your preferences in receiving marketing from us as well as your communication preferences.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your data by filling in forms, in creating your profile, or by corresponding with us by post, phone, email or otherwise.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect data about your equipment, browsing actions and patterns. We collect this personal data by using cookies other similar technologies. We collect such data to be able to properly provide you with our services. Please see our cookie policy [LINK] for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties with whom we interact, and who you are authorized to share your data with us.

4. Lawful basis for our use of your personal data

We will only use your personal data as allowed by law. Usually, we will use your personal data in the following circumstances allowed under relevant laws:

- ✓ Where you consent to our use of your personal data
- ✓ Where we need to perform the contract which we are about to enter into or have entered into with you.

- ✓ Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- ✓ Where we need to comply with a legal obligation.
- ✓ Where we need to protect your vital interest or the vital interest of another individual
- ✓ Where it is in the interest of the general public to process your data

While we mostly collect and process your data with your consent, we may collect and process your data under any of the identified lawful basis depending on the circumstance. We do not always need your consent to process your data.

We do need your consent before we can process your data for purposes such as direct marketing communications. You are at liberty to withdraw your consent to such kinds of processing at any time. Where such withdrawal makes us unable to proceed with providing you with certain services, we will inform you accordingly.

5. Why we use your data?

We collect data to enable us process requests which you make, or which are made on your behalf with your consent and to provide you with our services, to enter contractual or employment relationships with you or to provide you with any of our products or services.

We collect data to be able to communicate with you, to provide further information on our products and services and to assist you (mail subscriptions).

We also collect data to be able to respond to questions or requests which you submit as well as anticipate and resolve problems with any services we offer to you.

6. Failure to provide data

Where you refuse to provide data required under contract or under law when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods). Where we have to cancel an contractual arrangement you have made with us or which we have made with you, because you have not provided us with relevant data, we will notify you in time.

7. Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. Disclosures of your Personal Data

Although we do not typically share your data, it may become necessary for us to share your personal data with third parties. These third parties may include internal third parties such as members of our company (including foreign entities which we are directly affiliated with) or external third parties such as our service providers and business partners.

We may disclose any information about you as required by law and we may make such disclosures to law enforcement agencies and government officials, as necessary or appropriate under the relevant circumstance. Other than these instances, we do not disclose or share your personal data provided to us without your authorisation.

We would require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. International transfers

We do not routinely transfer your data outside of Nigeria. Whenever we transfer your personal data out of Nigeria, we ensure that a similar degree of protection is afforded to it in the country to which it is transferred. You hereby consent to such transfers where such adequate protection has been ensured for you data.

10. Data security

We have well-maintained systems for storing and managing your data, and we commit to conscientiously utilising your data in consonance with the provisions of this policy.

We have suitable security measures in place to prevent your personal data from being accidentally lost or used or accessed in an unauthorised way by a third party.

In addition, we limit access to your personal data to only those employees, agents, contractors and other third parties who need to have access to their personal data in order to enable us to provide our services to you. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We admit however that no database is completely secure or “hacker proof” and we only guarantee the safety of your data to the extent of our undertaking all reasonable measures to protect your data.

11. Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

12. Your legal rights

In addition to being able to control the data you directly provide to us, you may exercise any of the below rights with respect to your data:

1. Request information about any of your personal data which we are processing, and request access to your personal information which we process.
2. Request correction of personal information that we hold about you to make them more accurate or to reflect change in circumstances.
3. Request us to refrain from doing certain things with your data or restrict the extent of our collection or processing of your data.
4. Request partial or complete erasure of your personal information.
5. Object to our processing of your personal information where we are processing your personal information for direct marketing purposes.
6. Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you.
7. Request the transfer of your personal information to another party. If you wish to exercise any of the rights set out above, please contact us **using the contact details provided below.**

13. Accuracy of Data

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

14. Contact Details

If you have any questions about this privacy policy or our privacy practices, please contact us using the details provided below:

Multipro Consumer Products Limited

Address: 38 Eric Moore Road, Surulere Lagos

Email address: contactus@mcpl.com.ng

Telephone number: 07064000796/09053831935

15. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on the 9th of April 2020.