

# Privacy Policy

## Introduction

This Privacy Policy ("Policy") outlines how we handle your personal data at Efortlex Limited (Herein referred as "we," "our," or "us"). It governs the collection, use, and protection of your personal data when you use our website efortlex.com ( Herein referred as "Website"). We are committed to ensuring the security and confidentiality of your personal information and complying with the Nigerian Data Protection Act (NDPA), the General Data Protection Regulation (GDPR) and other relevant privacy laws.

## 1. Information We Collect

We collect and process various types of personal data to enhance your experience and provide better services. Below are a list of personal data we may collect include:

- a. **Contact Information:** Your name, email address, phone number, and postal address. For instance, we might use your email address to send you order confirmations.
- b. **Identification Data:** Government-issued ID or passport number. In some cases, we might require this for age verification when offering age-restricted services.
- c. **Financial Data:** Payment information, credit card details. When you make a purchase on our site, your payment details are securely processed through a trusted payment gateway.
- d. **Technical Data:** IP address, browser type, and device information. This helps us analyze user behavior on our website and tailor our content accordingly.
- e. **Usage Data:** Information about how you interact with our Website. This assists us in improving our services and enhancing your browsing experience.
- f. **Marketing and Communication Data:** Your preferences for receiving marketing information. If you've subscribed to our newsletter, we'll only send you promotional emails if you've explicitly consented.

## 2. Legal Basis for Processing

We process your personal data under various legal bases:

- a. **Contractual Necessity:** When you make a purchase, we use your data to fulfill our contractual obligations, such as delivering your order.

- b. **Consent:** If you've given explicit consent, we may process your data for specific purposes. For instance, we'll only send you marketing emails if you've agreed to receive them.
- c. **Legal Obligation:** We process data to comply with legal requirements, such as providing information to tax authorities as required by law.
- d. **Legitimate Interests:** We might process data for our legitimate business interests. For example, analyzing user behavior to improve our website's performance benefits both you and us.

### 3. Use of Personal Data

We utilize your personal data in a variety of ways:

- a. **Providing and Improving Services:** Your data helps us offer you a seamless experience on our website and continuously enhance our offerings.
- b. **Processing Transactions and Orders:** When you make a purchase, we use your data to process and fulfill your order.
- c. **Communication:** We use your data to respond to your inquiries and communicate with you effectively.
- d. **Marketing Materials:** With your explicit consent, we may send you marketing materials to keep you informed about our products and services.
- e. **Compliance:** We process data to fulfill our legal obligations, such as reporting financial transactions as required by applicable laws.
- f. **Protecting Our Rights:** Your data helps us safeguard our rights and interests, such as addressing fraudulent activities.

### 4. Your Rights

Under the Nigerian Data Protection Act (NDPA), General Data Protection Regulation (GDPR), you, as a user, are granted several fundamental rights that empower you to have control over your personal data. These rights ensure transparency, fairness, and accountability in the processing of your information by us. Here's an elaboration of each right:

- a. **Right to Access:** This right allows you to obtain confirmation from us as to whether we are processing your personal data and, if so, to access that data. You can request a copy of the data we hold about you and gain insights into how and why your data is being processed.
- b. **Right to Rectification:** You have the right to request the correction of any inaccurate or incomplete personal data we hold about you. If you believe that any of the information we have is incorrect, you can request us to update it accordingly.
- c. **Right to Erasure (Right to Be Forgotten):** This right grants you the ability to request the deletion or removal of your personal data when certain conditions are met. This includes situations where the data is no longer necessary for the purposes it was collected, or if you withdraw your consent and there are no legitimate grounds for continuing the processing. However, there are instances where this Right may not be instantly granted. Below are a list of legitimate grounds that may justify our refusal to erase of your data they include:
  - **Legal Obligations:** If there are legal obligations that require us to retain certain data, we may refuse erasure. For instance, financial records that need to be retained for a specified period due to tax regulations or other legal requirements may be exempt from erasure.
  - **Exercise or Defense of Legal Claims:** Data may be retained if it is necessary for the establishment, exercise, or defense of legal claims. For example, if there is an ongoing legal dispute or investigation involving the data subject, erasure might not be possible until the matter is resolved.
  - **Public Interest:** If data processing is in the public interest or is necessary for the performance of a task carried out in the public interest, erasure might not apply. For instance, public health data collected for epidemiological purposes may need to be retained for the greater public good.
  - **Archiving Purposes:** Data may be retained for archiving purposes in the public interest, scientific or historical research, or statistical analysis. An example could be research data that contributes to scientific advancements or historical records.
  - **Freedom of Expression and Information:** If erasure would infringe upon the right to freedom of expression and information, particularly in cases where the data has been published lawfully and is related to public figures or matters of public interest, refusal of erasure might be applicable.

- **Protection of Rights and Freedoms:** If retaining the data is necessary for the protection of the rights and freedoms of others, erasure may be denied. For instance, if erasing certain data could impede the identification and prevention of fraudulent activities.
- **Vital Interests:** If the data processing is necessary to protect someone's vital interests, such as life and physical integrity, erasure might be refused. For example, medical data that is crucial for urgent medical treatment may not be erased.

It's important to note that the application of these legitimate grounds will depend on the specific circumstances of each case. We will carefully assess whether any of these grounds are applicable before refusing to erase a data subject's information. Our goal is to strike a balance between upholding data subject rights and complying with legal obligations and legitimate interests.

- d. **Right to Restrict Processing:** You can request the restriction or suppression of your personal data under certain circumstances. This right allows you to limit the processing of your data, often while disputes are being resolved or if you contest the accuracy of the data. Also, if we use your data for marketing purposes, and you no longer wish to receive promotional materials, you can let us know, and we will respect your choice.
- e. **Right to Data Portability:** You have the right to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format. You can also request us to transmit that data to another data controller, where technically feasible.
- f. **Right to Object:** You can object to the processing of your personal data if it is being used for direct marketing purposes or if the processing is based on legitimate interests or the performance of a task carried out in the public interest.

## 5. Data Retention

We retain your personal data only for the duration necessary to fulfill the purposes outlined in this Privacy Policy, and in accordance with legal obligations. The retention periods may differ depending on the type of data and the relevant laws that apply.

## 6. Data Security

To ensure the protection and confidentiality of your personal data, we have implemented robust technical and organizational measures. These measures include encryption, access controls, regular security assessments, and staff training to prevent unauthorized access, alteration, disclosure, or destruction of your data.

## **7. Third Parties**

In certain instances, we may share your personal data with trusted third parties to facilitate various services as described in this Policy. We ensure that any third parties we engage with adhere to the same high standards of data protection and security as we do. These third parties process your data in compliance with NDPA, GDPR and other relevant privacy laws requirements.

## **8. Exercising Your Rights**

To exercise your rights, or if you have questions or inquiries about this Privacy Policy, please contact us at [info@efortlex.com](mailto:info@efortlex.com). We are committed to responding to your requests within one month and assisting you in understanding and exercising your rights under the GDPR.

## **9. Changes to This Policy**

We maintain the right to update this Privacy Policy to accurately reflect changes in our practices or legal obligations. In the event of material changes, we will communicate these changes through appropriate channels and indicate the "Last Updated" date at the beginning of this Policy.

## **10. Contact Us**

For any questions, concerns, or requests regarding this Policy or your personal data, please do not hesitate to reach out to us at [info@efortlex.com](mailto:info@efortlex.com). We are here to assist you and ensure your privacy and data protection.

This Privacy Policy was last updated on 1 August.