



TD Africa

...Empowering You

DATA PRIVACY AND PROTECTION POLICY

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1 Introduction

Technology Distributions Limited (TD) commenced business in May 1999 as the pioneer ICT distributor in West Africa and currently represents HP, Microsoft, APC, IBM, Dell EMC, Cisco, Huawei, Lenovo, InFocus, Infinix, Tecno, Nokia, Bosch & Samsung.

As the first manufacturer-accredited local distributor for the sub-region, TD, with the support of the OEMs, successfully confronted the myriad challenges posed by the hitherto unstructured market. Among the first measures was the formulation of a clear policy on the channel of distribution that led to the adoption of the prevailing four-tier market structure comprising original equipment manufacturer (OEM), distributor, reseller and end-user.

This development, coupled with TD's high stocking capability, brought relief to all stakeholders by ending decades of problematic reliance on foreign distributors with no local value add. Our services are provided at our branches and through electronic channels including the Internet.

Customers and potential customers can access our services through these channels including our website www.tdafrica.com. By accessing our services, customers provide certain personally identifiable information.

This document details the policies of the organization's guiding the collection, use, storage, destruction and disclosure of this personally identifiable information. Please read it thoroughly before accessing our service. By opening an account or accessing or subscribing to any of the organization's services, you give consent to the processing of your personal data in accordance with this policy.

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

1.1 Glossary

“**Consent**” of the Data Subject means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which he or she, through a statement or a clear affirmative action, signifies agreement to the processing of Personal Data relating to him or her;

“**Data**” means characters, symbols and binary on which operations are performed by a computer, which may be stored or transmitted in the form of electronic signals, stored in any format or any device;

“**Data Protection Officer or DPO**” means the person appointed as such under the Data Protection Laws and in accordance with its requirements. A DPO is responsible for advising Technology Distributions Limited (including its employee) on their responsibilities under the Data Protection Laws, for monitoring compliance with Data Protection Law;

“**Data Subject**” means any person, who can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity;

“**Our Services**” means the services provided by to the organization to the customer, which include but not limited to software licence sales, data centre and cloud services, security products, sales of printing and consumables;

“**Personal Data**” means 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; It can be anything from a name, address, a photo, an email address, bank details, posts on social networking websites, medical information, and other unique identifier such as but not limited to MAC address, IP address, IMEI number, IMSI number, SIM, Personal Identifiable Information (PII) and others;

“Personal Identifiable Information (PII)” means information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in a context

“Processing” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

2 Information Collection and Use

We collect several different types of information for various purposes to provide and improve our services to you.

2.1 Types of Data Collected

Personal Data

While using our services, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally Identifiable Information may include, but is not limited to:

- i. **Name and Contact Data:** We collect your first, middle and last name, email address, bank verification number, postal address, phone number, signature, date of birth, an identification document such as a copy of

driver's license, international passport, national identity card, and other similar contact data.

- ii. **Usage Data:** We may also collect information that your browser sends whenever you access our online services and/or when you access the services by/or through a mobile device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access services by or through a mobile device, this Usage Data may include the following:

- a. **Geo-Location information:** We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
 - b. **Mobile Device Access:** We may request access or permission to certain features from your mobile device, including your mobile device's camera, calendar, bluetooth, contacts, storage and other features. If you wish to change our access or permissions, you may do so in your device's setting.
 - c. **Mobile Device Data:** We may automatically collect device information (such as your mobile device ID, model and Manufacturer), operating system, version information, IP address and diagnostic data.
- iii. **Tracking & Cookies Data:** We use cookies and similar tracking technologies to track the activity on our website.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

2.2 Use of Analytics to Collect/Monitor/Analyse Data

We may use third-party Service Providers to monitor and analyse the use of our Service.

i. Google Analytics

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

For more information on the privacy policies of Google, please visit the Google Privacy & Terms web page located at <https://policies.google.com/privacy?hl=en>

ii. Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

2.3 Use of Data

The purpose of collecting personally identifiable information is to enable us to provide you with the services you have subscribed to and ensure that you are able to carry out transactions without hitches.

The usage of data may be extended beyond the above whenever necessary for the purposes of meeting legal, regulatory, contractual obligations, and other legitimate business interests.

Specifically, the uses the organization could put your data into include but not limited to:

- To provide and maintain our services
- To notify you about changes to our service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues
- To facilitate account opening
- To send you marketing and promotional communications for business purposes
- To deliver targeted advertising to you for our Business Purposes and/or with your consent. We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and or location and to measure its effectiveness

3 Transfer of Data

The world today is interconnected and so is the provision of services. For instance, there could be many counterparties involved for a transaction to be successfully completed. These include the banks, the switching companies, logistics companies, partners, and the employees of the organization. Certain personal data will traverse these parties in the normal course of carrying out transactions.

Save as related to the provision of services and meeting legal, regulatory, contractual, and other uses tangential or incidental to these, Technology Distributions Limited will not share your personal data with a third party. Where it becomes necessary to do so, adequate security measures will be taken to protect the data from access by recipients other than those for which it is intended. All data we collect will reside in Technology Distributions Limited's computer systems in Nigeria. Where cloud services are used, adequate governance measures that apply to such cloud services will be complied with.

Technology Distributions Limited will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. No transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

4 Disclosure of Data

We only share and disclose your information in the following situations:

- i. **Compliance with Laws:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

- ii. **Vital interests and Legal Rights:** We may disclose your information where we believe it is necessary to investigate, prevent, or act regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- iii. **Third-party Service Providers:** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work, which is necessary to provide the envisaged services. Examples include but not limited to: payment processing, data analysis, email delivery, customer service and marketing efforts. For the purpose of service improvement, we may allow selected third parties to use tracking technology on the services which will enable them to collect data about how you interact with the services over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content and better understand online activity. Unless described in this policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

5 Security of Data

The security of your data is important to us. We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our services is at your own risk. You should only access the services within a secure environment.

6 Personal Data Retention Period

We will only keep your personal information for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). Upon request for account closure, your account will be closed but this closure will not involve deletion of historical records of the account for the reasons already stated. However, except as may be required by law or law enforcement agents and or regulators, further processing of the personal information related to the account will cease from the time of closure.

7 Your Privacy Rights

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right to (i) request access and obtain a copy of your personal information, (ii) request rectification or erasure; (iii) restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances as stated in section 2.8 of the Nigeria Data Protection Regulation, you may also object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: https://edpb.europa.eu/about-edpb/board/members_en

Account Information

If you would at any time like to review or change the information in your account or terminate your account, you can contact us using the contact information provided.

Cookies and Similar technologies: Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features of our services to you. To opt-out of interest-based advertising by advertisers on our services kindly contact us at customercare@tdafrica.com

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list - however, we will still need to send you service-related emails that are necessary for the administration and use of your account. To otherwise opt-out, you may:

- Note your preferences when you register an account with the site
- Access your account settings and update preferences
- Contact us using the contact information provided

8 Automated Individual Decision-making or Profiling

We do not use any automated processing systems for coming to specific decisions – including profiling.

9 Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on our webpage and making it available at our branches.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on our webpage.

10 Contact Us

If you have any further questions or comments about us or our policies, email us at customercare@tdafrica.com or by post to:

Technology Distributions Limited

5 Redemption Crescent,

Gbagada Industrial Estate,

Lagos, Nigeria

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