



CORNERBLOCK SERVICES LIMITED

PRIVACY POLICY FOR CLIENT DATA

DOCUMENT CLASSIFICATION: FOR CLIENTS

Plot 954A, Idejo Street,
Off Adeola Odeku Street,
Victoria Island, Lagos, Nigeria
+234 (1) 229 2516
www.cornerblockservicesltd.com

PRIVACY POLICY

This privacy notice for Cornerblock Services Limited ("we," "us," or "Our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use Our services ("Services"), such as when you:

Engage with us in other related ways, including any sales, marketing, or events.

Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

DEFINITIONS

For the purposes of this Privacy Policy:

- I. 'Account' means a unique account created for You to access our Service or parts of our Service.
- II. 'Company' (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Cornerblock Services Limited.
- III. 'Cookies' are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- IV. 'Country' refers to: Nigeria.
- V. 'Device' means any device that can access the Service such as a computer, a cell phone or a digital tablet.
- VI. 'Personal Data' is any information that relates to an identified or identifiable individual.
- VII. 'Service' refers to the Website or when you engage with us in other related ways, including any sales, marketing, or events.
- VIII. 'Usage Data' refers to data collected automatically, either generated using the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- IX. 'Website' refers to Cornerblock Services Limited, accessible from <https://www.cornerblockservices.com>

X. 'You' means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at info@cornerblockservices.com.

TABLE OF CONTENTS

PRIVACY POLICY	2
Interpretation	2
DEFINITIONS	2
SUMMARY OF KEY POINTS	5
1. WHAT INFORMATION DO WE COLLECT?	6
2. HOW DO WE PROCESS YOUR INFORMATION?	7
3. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?	8
4. HOW LONG DO WE KEEP YOUR INFORMATION?	8
5. HOW DO WE KEEP YOUR INFORMATION SAFE?	8
6. DO WE COLLECT INFORMATION FROM CHILDREN?	9
7. WHAT ARE YOUR PRIVACY RIGHTS?	9
8. DO WE MAKE UPDATES TO THIS NOTICE?	10
9. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?	10
10. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?	10

SUMMARY OF KEY POINTS

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

- I. **What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.
- II. **Do we process any sensitive personal information?** We may process sensitive personal information, when necessary, with your consent or as otherwise permitted by applicable law.
- III. **Do we collect any information from third parties?** We do not collect any information from third parties.
- IV. **How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.
- V. **What are your rights?** Rights are processed according to Nigerian Privacy laws which means you have certain rights regarding your personal information.

1. WHAT INFORMATION DO WE COLLECT?

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or Our products and Services, when you participate in activities on the Services, or otherwise when you contact us. The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses
- Home addresses
- Bank Verification Number (BVN)
- Employment details
- Salary information
- Contact preferences
- Contact data

Sensitive Information: When necessary, with your consent or as otherwise permitted by applicable law, we process the following categories of sensitive information:

- Financial data
- Government identifiers (e.g., National Identification Number)

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information. *(NDPR 2019 Policy)*

2. HOW DO WE PROCESS YOUR INFORMATION?

We process your information to provide, improve, and administer Our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent including:

- **To facilitate account creation and authentication and otherwise manage user accounts:** We may process your information so you can create and log in to your account, as well as keep your account in working order.
- **To deliver and facilitate delivery of services to the user:** We may process your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users:** We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To request feedback:** We may process your information when necessary to request feedback and to contact you about your use of Our Services.
- **To send you marketing and promotional communications:** We may process the personal information you send to us for Our marketing purposes, if this is in accordance with your marketing preferences. You can opt out of Our marketing emails at any time.
- **To protect Our Services:** We may process your information as part of Our efforts to keep Our Services safe and secure, including fraud monitoring and prevention.
- **To comply with Our legal obligations:** We may process your information to comply with Our legal obligations, respond to legal requests, and exercise, establish, or defend Our legal rights.

3. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We do not use cookies and other tracking technologies to gather information when you interact with Our Services.

4. HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period in which users have an account with us. *(NDPR 2019 Policy)*

5. HOW DO WE KEEP YOUR INFORMATION SAFE?

We have implemented robust and comprehensive technical and organizational security measures designed to protect the security of any personal information we process. Our security measures include encryption, firewalls, secure access controls, and regular security audits to ensure the highest level of protection for your information.

We are committed to maintaining the security of your personal information and have rigorous procedures in place to prevent unauthorized access, data breaches, and other security incidents. Our information security team continuously monitors and updates our systems to address potential vulnerabilities and respond swiftly to any threats.

Rest assured that protecting your personal information is our top priority, and we take all necessary steps to safeguard your data within our Services. Your trust is important to us, and we are fully dedicated to maintaining the confidentiality and integrity of your personal information. *(NITDA Data Protection Implementation Framework)*

6. DO WE COLLECT INFORMATION FROM CHILDREN?

We do not knowingly collect, solicit data from, or market to children under 18 years of age, nor do we knowingly sell such personal information. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from Our records. If you become aware of any data we may have collected from children under age 18, please contact us at info@cornerblockservices.com. (NDPR 2019 Policy)

7. WHAT ARE YOUR PRIVACY RIGHTS?

Under the Nigerian Data Protection Regulation (NDPR) 2019, you have certain rights regarding your personal information. These rights may include:

- I. The right to access your personal information: You have the right to request a copy of the information we hold about you.
- II. The right to rectification: You have the right to request that we correct any inaccurate or incomplete information we hold about you.
- III. The right to erasure: You have the right to request that we delete your personal information, unless we have a compelling reason to keep it.
- IV. The right to restrict processing: You have the right to request that we restrict the processing of your personal information.
- V. The right to object to processing: You have the right to object to the processing of your personal information for marketing purposes.
- VI. The right to data portability: You have the right to request that we transfer your personal information to another data controller.

8. DO WE MAKE UPDATES TO THIS NOTICE?

We will update this privacy notice only when there are changes in the applicable policies and laws. The updated version will be indicated by an updated "Revised" date at the top of this privacy notice. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information. (*NDPR 2019 Policy*)

9. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at info@cornerblockservices.com.

10. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

You have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please fill out and submit a data subject access request.

This privacy policy is guided by the Nigeria Data Protection Regulation (NDPR) 2019 and other applicable laws and regulations in Nigeria.

We are duly licensed and regulated by the CBN under the Finance House and Money Lenders Association Act.

We are duly certified by FCCPC to carry out business as an authorized Digital Lender (DML License)

Thank you for choosing Cornerblock Services Limited. We value your trust and are committed to protecting your personal information. If you have any questions or concerns about our privacy practices, please don't hesitate to contact us.