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1.Introduction

We value your privacy. This privacy policy explains personal data that **Cinfore Limited** collect when using our product and services, how we process it and for what purpose it is used including how we protect your data both in storage and transit.

2. Details

2.1 Information We Collect

We collect information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below;

- **Information you provide to us:** We collect information about you when you input it into the Services or otherwise provide it directly to us
- **Account and Profile Information** - We collect information about you when you register for an account, create or modify your profile, set preferences, sign-up for or make purchases through the Services we provide such as brainfriend.
- **Content you provide through our products** - The Services include the content and assessment products you use; the software service we manage on behalf of our clients as processors. We also collect and store content that you post, send, receive and share in our platforms. This content includes any information about you that you may choose to include.
- **Content you provide through our websites** -The Services also include our websites owned or operated by us. We collect other content that you submit to these websites, which include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, activities or events
- **Information you provide through our support channels** - The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service.
- **Cookies and Other Tracking Technologies-** Our products including websites do not use cookies at the moment at the moment but when this becomes applicable, we will comply with all requirements for cookies.
- **Information we receive from other sources** - We receive information about you from other Service users, from third-party services, from our related companies, social media platforms, public databases, and from our business and channel partners
- **Third Party Providers** - We may receive information about you from third party providers of business information and publicly available sources (like social media platforms), including physical mail addresses, job titles, email addresses, phone numbers, intent data (or user behavior data), IP addresses and social media profiles, for the purposes of targeted advertising of products that may interest you, delivering personalized communications, event promotion, and profiling

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2.2 How we use Information We Collect

How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you

- **To provide the Services and personalize your experience** - We use information about you to provide the Services to you, including to process transactions with you, authenticate you when you log in, provide customer support, operate, maintain, and improve the Services.
- **For research and development** - We are always looking for ways to make our Services smarter, faster, secure, integrated, and useful. We use information including feedback about how people use our Services to troubleshoot, to identify trends, usage, activity patterns, and areas for integration and to improve our Services and to develop new products, features and technologies that benefit our users and the public
- **To communicate with you about the Services** - We use your contact information to send transactional communications via email and within the Services, including confirming your purchases, reminding you of subscription expirations, responding to your comments, questions and requests, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages
- **To market, promote and drive engagement with the Services** - We may use your contact information and information about how you use our services to send promotional communications that may be of specific interest to you. This will only be done with your consent.
- **Customer support** - We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyze information, and to repair and improve the Services. Where you give us express permission to do so, we share information with a third party expert for the purpose of responding to support-related requests.
- **For safety and security** - We use information about you and your Service to verify accounts and activity, to detect, prevent, and respond to potential or actual security incidents and to monitor and protect against other malicious, deceptive, fraudulent or illegal activity, including violations of Service policies
- **To protect our legitimate business interests and legal rights** - Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business
- **With your consent** - We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission

2.3 How we share information we collect

We share information we collect about you in the ways discussed below, including in connection with possible business transfers;

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- **Sharing with other Service users** - When you use our services, we share certain information about you with other service users
- **For collaboration** - You can create content, which may contain information about you, and grant permission to others to see, share, edit, copy and download that content based on settings you or your administrator (if applicable) select.
- **Managed accounts and administrators** - If you register or access the Services using an email address with a domain that is owned by your employer or organization or associate that email address with your existing account, and such organization wishes to establish an account or site, certain information about you including your name, profile picture, contact info, content and past use of your account may become accessible to that organization's administrator and other Service users sharing the same domain. If you are an administrator for a particular site or group of users within the Services, we may share your contact information with current or past Service users, for the purpose of facilitating Service-related requests.
- **Community Forums** - We may collaborate with other companies, government agencies for forums and your personal data may be shared to facilitate the program.
- **Sharing with third parties** - We may share information with third parties that help us operate, provide, improve, integrate, customize, support and market our services
- **Service Providers** - We may work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including appropriate security and confidentiality procedures designed to protect your information.
- **Third Party Apps** - You, your administrator or other Service users may choose to add new functionality or change the behavior of the Services by installing third party apps within the Services. Doing so may give third-party apps access to your account and information about you like your name and email address, and any content you choose to use in connection with those apps. If you are an administrator, or a technical or billing contact listed on an account, we share your details with the third-party app provider upon installation. Third-party app policies and procedures are not controlled by us, and this privacy policy does not cover how third-party apps use your information. We encourage you to review the privacy policies of third parties before connecting to or using their applications or services to learn more about their privacy and information handling practices. If you object to information about you being shared with these third parties, please uninstall the app.
- **Links to Third Party Sites** - The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.
- **Social Media Widgets** - The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. Your use of and any information you submit to any of those third-party sites is governed by their privacy policies, not this one.

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- **With your consent** - We share information about you with third parties when you give us consent to do so. For example, we often display personal testimonials of satisfied customers on our public websites. With your consent, we may post your name alongside the testimonial.
- **Sharing with affiliated companies** - We share information we collect with affiliated companies and, in some cases, with prospective affiliates. Affiliated companies are companies owned or operated by us. The protections of this privacy policy apply to the information we share in these circumstances
- **Business Transfers** - We may share or transfer information we collect under this privacy policy in connection with any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company. You will be notified via email and/or a prominent notice on the Services if a transaction takes place, as well as any choices you may have regarding your information

2.4 How we store and secure information we collect

The information we collect from you are stored and secured using various medium as stated below;

- **Information storage and security** - We use industry standard technical and organizational measures to secure the information we store and transmit. We are implementing the requirements of ISO 27001: 2013 for information security and ISO 27018 for cloud PII as well as complying with Nigerian Data Protection Regulation 2019.

2.5 How long we keep information

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

- **Account information** - We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re-activate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you
- **Information you share on the Services** - If your account is deactivated or disabled, some of your information and the content you have provided will remain in order to allow your team members or other users to make full use of the Services.
- **Managed accounts** - If the Services are made available to you through an organization (e.g., your employer), we retain your information as long as required by the administrator of your account

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- **Marketing information** - If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services

2.6. How long we keep information

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations

- You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format. To do this use data subject access request system. Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, for example, by installing third-party apps, you will need to contact those third-party service providers directly to have your information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to complain directly to NITDA.
- Our Services and related documentation give you the ability to access and update certain information about you from within the Service. For example, you can access your profile information from your account and search for content containing information about you using key word searches in the Service. You can update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content
- **Deactivate your account** - If you no longer wish to use our Services, you or your administrator may be able to deactivate your Services account. If you can deactivate your own account, that setting is available to you in your account settings. Otherwise, please contact your administrator. If you are an administrator and are unable to deactivate an account through your administrator settings, please contact the appropriate support team. Please be aware that deactivating your account does not delete your information; your information remains visible to other Service users based on your past participation within the Services.
- **Delete your information** - Our Services and related documentation give you the ability to delete certain information about you from within the Service. For example, you can remove content that contains information about you using the key word search and editing tools associated with that content, and you can remove certain profile information within your profile settings. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

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- **Request that we stop using your information** - In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy. Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable). If you object to information about you being shared with a third-party app, please disable the app or contact your administrator to do so.
- **Opt out of communications** - You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu, or by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services. You can opt out of some notification messages in your account settings.
- **Data portability** - Data portability is the ability to obtain some of your information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, this applies to some of your information, but not to all of your information. Should you request it, we will provide you with an electronic file of your basic account information and the information you create on the spaces under your sole control.

2.7. How we transfer information internationally

- **International transfers of information we collect** - We collect information globally and may transfer, process and store your information outside of your country of residence, to wherever we or our third-party service providers operate for the purpose of providing you the Services. Whenever we transfer your information, we take steps to protect it.

2.8. Other important privacy information

Many of our products are intended for use by organizations. Where the Services are made available to you through an organization (e.g. your employer), that organization is the administrator of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organization's policies. We are not responsible for the privacy or security practices of an administrator's organization, which may be different than this policy.

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Administrators are able to:

- require you to reset your account password;
- restrict, suspend or terminate your access to the Services;
- access information in and about your account;
- access or retain information stored as part of your account;
- install or uninstall third-party apps or other integrations

In some cases, administrators can also:

- restrict, suspend or terminate your account access;
- change the email address associated with your account;
- change your information, including profile information;
- restrict your ability to edit, restrict, modify or delete information

Even if the Services are not currently administered to you by an organization, if you are a member of a support team administered by an organization, or if you use an email address provided by an organization (such as your work email address) to access the Services, then the owner of the domain associated with your email address (e.g. your employer) may assert administrative control over your account and use of the Services at a later date. You will be notified if this happens.

2.9. Our policy towards children

Our Services such as BrainFriend are directed to individuals under 13 and we take step to ensure security of these data about children.

2.10. Changes to our Privacy Policy

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Services homepages, login screens, or by sending you an email notification. We will also keep prior versions of this Privacy Policy in an archive for your review. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

If you disagree with any changes to this privacy policy, you will need to stop using the Services and deactivate your account(s), as outlined above.

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2.11. Contact Us

If you have questions or concerns about how your information is handled, please direct your inquiry to

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Port Harcourt
Phone: +234 9038059682
Email: privacy@cinfores.com

Approved by:

Date of approval: 03.02.2023



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MD/CEO