

# PRIVACY POLICY

This Privacy Policy explains the privacy practices of Txtlight Power Solutions Limited (“**Lumos Nigeria**”, “**We**” or “**Our**”).

Lumos Nigeria respects your right to privacy and your ability to make informed choices about the uses of your information. This Privacy Policy describes how we collect, use, disclose, and protect Personal Data. The terms of this Privacy Policy apply to all information collected from you or about you.

You accept this Privacy Policy and hereby give Lumos Nigeria consent to save, process and use your Personal Data to the extent as allowed by law when you provide us with details of your Personal Data.

## **Collection of Personal Data.**

Personal Data is information that can be directly associated with an identifiable natural person such as a customer’s name, address, telephone number, email address, or credit card number.

You may be asked to provide your Personal Data anytime you contact us, and we shall use the Personal Data in consistence with this Privacy Policy. We may combine the Personal Data with other information in order to improve our products, services, content, and advertising. You may choose not to provide the Personal Data that we have requested but if you do so, we may not be able to provide you with our products or services or respond to any queries you may have.

We may collect Personal Data when you:

- Use our website - we may automatically collect some information such as information on the website from which you linked to our website, the time and date of your visit and activities.
- Purchase our products and services. We may also collect information received from third parties to the extent that they have represented that they have entered into an agreement with you for the provision of our services.
- Contact our customer service center whether by phone, email, or chat.

You must be 18 years of age or older in order to establish and operate an account with Lumos Nigeria or validly use this website.

## **Use of Personal Data.**

We may use your Personal Data in the following circumstances:

- for compliance with legal obligations to which we are subject, in performance of a contractual agreement, for your vital interest or when we have assessed it is necessary for our or a third party legitimate interests;
- in order to create, develop, operate, deliver, and improve our products, services and advertising;
- for internal purposes such as auditing, data analysis, and research, and for loss prevention and anti-fraud purposes;

- for account and network security purposes, including in order to protect our services for the benefit of all our users;
- to administer promotions (i.e., lottery, contest or similar promotion) you enter into;
- to send important notices, such as communications about purchases, plans and changes to our terms, conditions and policies. Because this information is important to your interaction with us, you may not opt out of receiving these communications.

#### **Collection of Non-Personal Data.**

We may collect, use, transfer, and disclose non-personal data for any purpose. Non-personal data is collected or used in a form that does not, on its own, permit direct association with any specific individual. Such information may include occupation, language, zip code, area code, unique device identifier, referrer URL, location, time zone, information from the Solar Power Systems or solar panels. We may use and disclose de-identified aggregate information for the purposes of evaluating and improving our services, tailoring our products and for commercial purposes. We may choose at our sole discretion to transfer, sell, provide, or share such information with third parties, including our business partners for commercial purposes.

If we combine non-personal data with Personal Data, the combined information will be treated as Personal Data for as long as it remains combined.

#### **Protection of Personal Data.**

We have put in place security measures in an effort to protect Personal Data from loss, misuse, or alteration while it is under our control. Personal Data we collect is stored electronically. We use technical, contractual, administrative and physical measures in an effort to protect against unauthorized access.

While we use reasonable measures to protect information that is stored within our databases and restrict access to information to those employees who need access in order to enable them to perform their job functions (i.e., customer service personnel and technical staff), we cannot guarantee the security of the information. Unauthorized entry or use, hardware or software failure, and other factors may compromise the security of the information at any time. We also cannot ensure the security of the information you transmit to us, and so we urge you to take every precaution to protect your Personal Data when you are on the Internet. Change your passwords often, use a combination of letters and numbers, and make sure you use a secure browser.

#### **Promotional Messages**

By joining Lumos Nigeria, you agree to receive promotional messages from us. If at any time you wish to stop receiving promotional information from Lumos Nigeria, you may opt out by following the instructions as indicated in the messages/newsletter.

#### **Cookies and Other Technologies.**

Our website, email messages, and advertisements may use “cookies” and other technologies such as pixel tags and web beacons. Cookies enable us to understand which parts of our website people have visited, help us measure the effectiveness of ads and web searches, and give us insights into user behavior so we can improve our communications, services and products.

If you want to disable cookies in the Safari web browser, go to Preferences and then to the Privacy pane and choose to block cookies. For other browsers, check with your provider to find out how to disable cookies. Disabling cookies may prevent the use of certain parts of the website.

**We may use various cookies on our website, such as:**

Category 1 — Strictly Necessary Cookies

These cookies are essential to enable you to browse around our website and use its features.

Category 2 — Performance Cookies

These cookies collect information about how you use our website — for instance, which pages you go to most. This data may be used to help optimize our website and make it easier for you to navigate. These cookies don't collect information that identifies you. All information these cookies collect is aggregated and therefore anonymous.

Category 3 — Functionality Cookies.

These cookies allow our website to remember choices you make while browsing. For instance, we may store your geographic location in a cookie to ensure that we show you our localized website (when applicable). These cookies may also be used to keep track of what featured products or videos have been viewed to avoid repetition. The information these cookies collect will not personally identify you, and they cannot track your browsing activity on non-Lumos websites.

We treat information collected by cookies and other technologies as non-personal data. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered Personal Data by local law, we also treat these identifiers as Personal Data. Similarly, to the extent that non-personal data is combined with Personal Data, we treat the combined information as Personal Data for the purposes of this Privacy Policy.

**How long Lumos keeps your Personal Data.**

We will keep your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), for our legitimate purposes e.g. resolve disputes, and enforce our legal agreements and policies.

**Disclosure**

We may use service providers who process your data on our behalf. We may share your information with other companies we work in partnership with. We may also share your information with others outside of the Lumos Nigeria.

If we are involved in a merger, acquisition or asset sale, your Personal Data may be transferred.

Under certain circumstances, we may disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

We may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of Lumos Nigeria
- Prevent or investigate possible wrongdoing in connection with a service

- Protect the personal safety of others or the public
- Protect against legal liability

### **Cross border Disclosure**

We may enter into arrangements with third parties to store data we collect or to access the data to provide services (such as data processing), and such data may include Personal Data being transferred outside of Nigeria. We will take reasonable steps to ensure that the third parties do not violate the NDPR requirements. The steps we will take may include ensuring the third party is bound by privacy protection obligations which are the same (or substantially the same) as those which bind us and requiring that the third party has information security measures in place which are of an acceptable standard with global best practices and approved by us. Furthermore, where necessary, we will take all steps necessary to comply with the NDPR as regards NITDA's Adequacy Decision/Whitelist when transferring the Personal Data of Data Subjects to a foreign country.

### **Your rights as a Data Subject**

At any point while we are in possession of or processing your Personal Data, you, the data subject has the following rights:

- RIGHT OF ACCESS – You have the right to request a copy of the information that we hold about you.
- RIGHT TO RECTIFY – You have the right to correct the Personal Data we hold about you that is inaccurate.
- RIGHT TO BE FORGOTTEN – In certain circumstances you may ask for the data we hold about you to be erased from our records.
- RIGHT TO RESTRICT PROCESSING – Where certain conditions apply, you have a right to restrict processing of your Personal Data.
- RIGHT TO PORTABILITY – You have the right to have your Personal Data transferred to another organisation.
- RIGHT TO LODGE A COMPLAINT -You have a right to lodge a complaint about the handling of your Personal Data with the Nigeria Data Protection Bureau (NDPB) at [info@ndpb.gov.ng](mailto:info@ndpb.gov.ng).

### **Updating, Reviewing or Correcting Personal Data.**

You may update, review or correct your information by contacting our Customer Service Center on 08001234567.

### **Breach/Privacy Violation**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data, we shall within 72 (Seventy-Two) hours of having knowledge of such breach report the details of the breach to NITDA.

Furthermore, where we ascertain that such breach is detrimental to your rights and freedoms in relation to your Personal Data, we shall within 7 (seven) days of having knowledge of the occurrence of such breach take steps to inform you of the breach incident,

the risk to your rights and freedoms resulting from such breach and any course of action to remedy said breach.

### **Access and Correction**

You have the right to have access to the Personal Data we hold about you. You can also request an amendment to Personal Data that we hold about you should you believe that it contains inaccurate information. If you wish to obtain information about how to access or correct your Personal Data, please see the “Questions or Concerns” section for the contact details of our DPO.

We limit a one-month period to respond to your access request to your Personal Data which is in our possession. However, if the one-month timeline cannot be met or where we determine that the request made by you is excessive in nature, we will take steps to inform you and suggest alternative courses of action such as extension of the time within which to provide the information requested or request for cost in cases of requests of an excessive nature. We shall duly copy the regulatory authority in all such correspondence. Where we cannot act on your request, we will also take steps to inform you of such reason as well as the options available to you including the option of lodging a complaint with NITDA.

### **Changes to the Privacy Policy.**

We reserve the right to change this Privacy Policy at any time but will alert you that changes have been made by indicating at the bottom of the Privacy Policy the date it was last updated. We encourage you to review our Privacy Policy to make sure you understand how your information is and will be used.

### **Questions or Concerns**

If you have any questions or concerns about this Privacy Policy, you can contact our Data Protection Officer;

Moses Usuh-Abia, on: [moses.usoh-abia@lumos.com.ng](mailto:moses.usoh-abia@lumos.com.ng)

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