

# Co-creation Hub Privacy Policy Last Updated: 25/09/2024

## Co-creation Hub and Our Role and Responsibilities to Your Privacy

Hello! We are Co-creation HUB Limited (also known as CcHUB Nigeria), an innovation centre dedicated to accelerating the application of social capital and technology for economic prosperity. In compliance with the Nigeria Data Protection Act (NDPA) and global data protection regulation principles, we primarily qualify as a data controller. This means that we determine the purpose for, and the manner in which, we collect and process your data. In certain other instances, we also qualify as a data processor, as we carry out certain processing activities with the personal data you provide.

If you are our customer, a subscriber, user of our service, or just visiting our website, this privacy policy applies to you.

## Your Responsibilities

- Read this privacy policy
- If you are a user of our service, consultant, contractor, vendor, grantee, etc., please also check the contracts between us: they may contain further details on how we collect and process your data.
- If you provide us with personal information about other people, or if others give us your information, we will only use that information for the specific reason for which it was provided to us and related services or opportunities from our subsidiaries and partners after obtaining your explicit consent (see the “Affiliated Services” section of this policy). By submitting the information, you confirm that you have the right to authorize us to process it on your behalf in accordance with this privacy policy.

## **A. Data We Collect**

- Name
- Email
- Designation/Position
- Phone Numbers
- Contact Address
- Information required via investment contract
- Information required via program application

## **B. When We Collect Your Data**

- When you fill out our questionnaires and application forms
- When you sign up for our newsletter, job ads, or services
- When we enter into a contract as partners/vendors
- When you visit any of our spaces or offices
- When you interact with us via social media or other online platforms

## **C. How We Use Your Data**

- To process applications
- To complete transactions
- To send updates and information about specific CcHUB (or partner) services and programs
- To gather insights (from analytics) and improve our services and user experience

## **D. Where We Store Your Data**

All the platforms we use for data collection (see section F below) also come with data storage capabilities, which we readily employ. In addition to this, we may also store or process your data using:

- Laptops, Desktops, and Smart Devices
- Google Drive
- Office 365
- Dropbox

We ensure that all storage locations are compliant with global standards and have appropriate safeguards, such as encryption and 2-factor authentication.

### **E. How Long Do We Store Your Data?**

Subject to relevant laws on data retention periods, we only store your information for as long as we need to, and this varies depending on the information collected and/or the duration of a contract entered into. For example, we will only keep CCTV footage for 30 days, while personal information collected for informational purposes may be stored for up to 7 years.

Personal data that is no longer needed will be securely deleted in compliance with global best practices.

You reserve the right to have your information with us altered or deleted at any time.

### **F. Third Parties**

We do not directly share your information with third-party organizations, individuals, or marketers. However, we use Google Analytics on our website, which gives us anonymous insights into the kind of data we collect and how users interact with our content. We employ the following third-party services in our collection of data and information for the purposes mentioned in section C:

- Typeform
- Screendoor
- Google Typeform
- Botsociety
- Landbot

Where we engage third-party service providers for data processing, we ensure that such providers comply with privacy and data protection best practices and have appropriate data processing agreements in place.

### **G. Disclosure to Government**

We may share your information with government or government agencies if we are required to do so under one or more of the following obligations:

- To comply with the laws of the Federal Republic of Nigeria, the Republic of Rwanda, the Republic of Kenya and United Kingdom
- To protect and defend the rights or property of CcHUB
- To prevent or investigate possible wrongdoing in connection with the service
- To protect the personal safety of users of the service or the public

- To protect against legal liability

In all cases, such disclosures will only be made to the extent strictly necessary.

## **H. Your Rights**

Be informed that under the NDPA, you reserve the right to:

- Access the data we store on you
- Correct or erase the data we have stored on you
- Object to or restrict continuous processing of your data
- Transfer or delete your personal data with us
- Withdraw your consent at any time where data processing is based on consent
- Lodge a complaint with the Nigeria Data Protection Commission (NDPC) or approach a court if we breach any area of this policy or how we use your data

In the case of a transfer to another service or business, we may charge a small fee to help us facilitate such a process.

## **I. Affiliate Services**

By signing up for any of our services or programs, you consent to receive information about similar services and programs from Co-creation Hub Limited, its subsidiaries, and partners, which include but not limited to.

- CcHUB Investment Company Limited(Syndicate)
- CcHUB Growth Capital Limited(GC)
- CcHUB Creative Economy Limited(CEP)
- CcHUB innovation Proprietary Limited(CcHUB Design Lab)
- iHUB Limited
- eLimu elearning Company Limited
- Mastercard Foundation
- Bill and Melinda Gates Foundation
- British Council
- Google
- National Endowment for Democracy (NED)
- Ford Foundation

- USAID
- Africa Development Bank (AFDB)
- Meta
- Luminare
- Challenge Fund for Youth Employment (CFYE)
- SAIL Empowerment Foundation
- Africa no Filter
- Civic Tech Innovation Network
- Government of Sierra Leone
- United Nations Industrial Development Organization (UNIDO)

You reserve the right to restrict the processing of your data for such purposes and unsubscribe from all such programs and services at any time.

## **J. Cookies**

We use cookies on our website to understand the behavior of users, help us improve our services, protect our platform, and enhance communication with our users.

Below are the cookies we use:

- Zfruid, Awsalb (Purpose: Load balancing and site security)
- Zlcstore (Purpose: On-site chat functionality)
- ZD-suid, ZD-buid (Purpose: Users' session identification)
- ZD-current time (Purpose: Registers date and time of site visit)
- Ga, Gat, Gid (Purpose: Statistical impressions on site visits)
- Zlc-mid (Purpose: Preserves user states across page requests)
- R/Collect (Purpose: Anonymously collects information on devices using site's resources)
- Zte# (Purpose: Saves unique identifications for live chat functionality)

You may choose to block cookies by adjusting your browser settings.

## **K. Security and Data Breach Notification**

We take the security of your information seriously and have invested in precautionary and safety measures to secure and protect your data with us, including encryption, data loss prevention mechanisms, 2-factor authentication, and a minimal access approach.

While we take care to do this, unfortunately, no security system is foolproof, including the channels through which you supply us with your data and the actual systems we have put in place to safeguard them.

You bear the responsibility of keeping your login information safe (including usernames, emails, and passwords).

In compliance with the domiciled data protection regulations, we will notify the relevant data protection authorities and affected individuals within 72 hours of discovery in the event of a data breach.

If you feel at any time that your data may have been compromised (e.g., due to phone theft or hacking), please contact our Data Protection Officer (details below). If you feel in any way that we have not handled your personal information in accordance with the domiciled data protection regulations including Nigeria Data Protection Act (NDPA), you also have the right to lodge a complaint with the supervisory authority via [info@ndpc.gov.ng](mailto:info@ndpc.gov.ng), [databreach@dpo.gov.rw](mailto:databreach@dpo.gov.rw) and [info@odpc.go.ke](mailto:info@odpc.go.ke),

## **L. Contact Us**

If you have any questions about our policy, how we use your data or want to access or review the data we store on you, please reach our Data Protection Officer at [privacy@cchub.africa](mailto:privacy@cchub.africa)