

CHI PHARMA LIMITED

PRIVACY POLICY

MAY, 2020

BY CLICKING ON “PROCEED” YOU AGREE TO US PROVIDING TO YOU THE INFORMATION YOU HAVE REQUESTED ABOVE AND CONFIRM THAT YOU HAVE READ AND AGREE TO THE USE OF YOUR INFORMATION AS SET OUT IN OUR PRIVACY POLICY BELOW

1. OUR POLICY

Welcome to Chi Pharma Limited's privacy policy (**Policy**).

Chi Pharma Limited (the **Company**) is committed to ensuring that your privacy is protected. This privacy policy explains how we use the information and personal data we collect from you, how you can instruct us if you prefer to limit the use of that information and procedures that we have put in place to safeguard your privacy from breach and infringement

This Policy is provided in a layered format so you can click through to the specific areas set out below.

PURPOSE

- 1.1. This Policy aims to provide information on how the Company collects and processes your personal data through your use of this website, including any data you may provide through this website when you either sign up to our newsletter, purchase a product or service or participate in a competition.
- 1.2. Please note that this website is not intended for children and we do not knowingly collect data relating to children.
- 1.3. It is important that you read this Policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

2. INFORMATION WE COLLECT

- 2.1. **Personal Data:** When you register for our services, we need to know your name and other personal details like postal address, email address, telephone number, credit card number, expiry date and other relevant information.

In addition to the above, your personal data may also be collected when you voluntarily provide such information, such as when you contact us with inquiries,

respond to one of our surveys (where requested), register for access to the Services, or use of certain Services.

- 2.2. **Aggregated Data:** This is information we receive about you if you use any of the other websites we operate or the other services we provide. [In this case we will have informed you upon collection of the data if we intend to share those data internally and combine it with data collected on this site. We will also inform you to what purpose we shall share and combine your data]. Relatedly, we are working closely with third parties (including but not limited to business partners, technical sub-contractors, payment and delivery solution providers, advertising networks, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.
- 2.3. **Other information:** Some personally non-identifiable data may be collected when you interact with the Company through the services. Such information, which is collected passively using various technologies, cannot presently be used to specifically identify you. The Company may store such information itself or such information may be included in databases owned and maintained by the Company's affiliates, agents or service providers. The Services may use such information in conjunction with other information to track the total number of visitors to our Site, the number of visitors to each page of our Site, and the domain names of our visitors' Internet service providers. It is important to note that no Personal Data is available or used in this process

3. OUR USE OF YOUR PERSONAL DATA AND OTHER INFORMATION

- 3.1. **Processing Registration:** We gather this information to enable us process your registration, process any orders you may make and render other relevant services as the Company may provide from time to time. The relevant information would also be utilised by us, our agents and sub-contractors to provide you with statements of your account and to communicate with you on any matter relating to the conduct of your account and the provision of the service in general

- 3.2. **Aggregated Personal Data:** We may also use aggregated information and statistics for the purposes of monitoring website usage in order to help us develop the website and our services and may provide such aggregated information to third parties. These statistics will not include information that can be used to specifically identify any user.
- 3.3. **Customer Service Improvement:** From time to time, we may provide your information to our customer service agencies for research and analysis purposes to enable us monitor and improve the services we provide. We or our agents and sub-contractors may contact you by post, e-mail or telephone to ask you for your feedback and comments on our services
- 3.4. **Advertising:** We may also wish to provide you with information about special features of our website or any other service or products we think may be of interest to you. If you would rather not receive this information, please send a blank e-mail message to info@clicktgi.net
- 3.5. **Third-Party Advertising Partners:** We may also want to provide you with related information from third parties we think may be of interest to you. If you would rather not receive this information, please send a blank e-mail to info@clicktgi.net
- 3.6. **Third Party Links:** We may also provide your information to carefully selected third parties whose products or services we believe may be of interest to you. If you do not wish us to disclose your information in this way, please send an email to info@clicktgi.net.
- 3.7. Please note that these third-party sites operate separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. We seek to protect the integrity of our website and welcome any feedback about these third party sites.

4. **OUR DISCLOSURE OF YOUR PERSONAL DATA AND OTHER INFORMATION**

The Company is not in the business of disclosing your information. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances wherein we may be required to share your Personal Data with certain third parties without further notice to you, as set forth below:

- 4.1. **Business Transfers:** As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets.
- 4.2. **Related Companies:** We may also share your Personal Data with our related Companies for purposes consistent with this Privacy Policy.
- 4.3. **Agents, Consultants and Related Third Parties:** The Company like many businesses sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases, and processing payments. When we employ another entity to perform a function of this nature, we only provide them with the information that they need to perform their specific function.
- 4.4. **Legal Requirements:** The Company may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of the Company, (iii) act in urgent circumstances to protect the personal safety of users of the Services or the public, or (iv) protect against legal liability;
- 4.5. **Advertisers and advertising networks:** some advertising networks may require data from our Site to select and serve relevant adverts to you and others. In providing such information, we do not disclose the particulars of identifiable individuals to our advertisers, but we will provide them with aggregate information about our users in terms of ratios or percentage split of our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers capture the calibre of audience they aim to target. We may make use of the personal data we have collected from you to enable us comply with our advertisers' requests by displaying their advertisement to that target audience.

5. ACCESSING AND UPDATING YOUR PERSONAL INFORMATION

- 5.1. Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes.

- 5.2. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

6. OUR USE OF COOKIES AND OTHER INFORMATION GATHERING TECHNOLOGIES

- 6.1. In operating the Services, we may use a technology called "cookies". A cookie is a piece of information that our host computer provides to your browser when you access the Services. Our cookies help provide additional functionality to the Services and help us analyze Service usage more accurately. They also assist in distinguishing you from other users of our Site and allows for a seamless interaction with our Site. For instance, our Site may set a cookie on your browser that allows you to access the Services without necessitating the need to remember and then enter a password more than once during a visit to the Site.
- 6.2. In all cases in which we use cookies, we will not collect Personal Data except with your permission. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We nonetheless recommend that you leave cookies turned on because they allow you to take advantage of some of the Service features.
- 6.3. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see www.chipharma.com/cookies and privacy statement.

7. HOW WE PROTECT YOUR INFORMATION

The internet is not a secure medium. However, we have put in place various security procedures as set out in this policy.

- 7.1. Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible
- 7.2. We also use regular Malware Scanning as a protective measure on our Site;

- 7.3. Your Personal Information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology
- 7.4. We implement a variety of security measures when a user places an order, enters, submits or accesses their information to maintain the safety of your personal information
- 7.5. All transactions are processed through a gateway provider and are not stored or processed on our servers
- 7.6. We restrict access to personal information to the Company's employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations

8. UPDATING YOUR DETAILS

- 8.1. From time to time and for security and other ancillary reasons, the Company may contact you to update any of the information that you have provided and you may voluntarily undertake to do so by updating your account on the website

9. SALE OF BUSINESS

- 9.1. If this business is sold or integrated with any other business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business

10. YOUR RIGHTS

- 10.1. You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@clicktgi.net

- 10.2. Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

11. EXCLUSIONS

- 11.1. This Privacy Policy does not apply to any Personal Data collected by the Company other than Personal Data collected through the Services. This Privacy Policy shall not apply to any unsolicited information you provide to the Company through the Services or through any other means. This includes, but is not limited to, information posted to any public areas of the Services, such as forums, any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, “**Unsolicited Information**”). All Unsolicited Information shall be deemed to be non-confidential and the Company shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution.

12. YOUR CONSENT AND CHANGES TO THE COMPANY’S PRIVACY POLICY

- 12.1. By submitting your information, you consent to the use of that information as set out in this Policy. The Services and our business may change from time to time. As a result, it may be necessary for the Company to make changes to this Policy. The Company reserves the right to update or modify this Policy at any time and from time to time without prior notice. Please review this Policy periodically, and especially before you provide any Personal Data. If we change our Policy, we will post the changes on this page and may place notice on other pages of the website, so that you may be aware of the information we collect and how we use it at all times.
- 12.2. We will also e-mail you should we make any changes so that you may consent to our use of your information in that way. Continued use of service will signify that you agree to any such changes

- 12.3. Owing to the global nature of the Internet Infrastructure, the information you provide may be transferred in transit to countries outside Nigeria that do not have similar protections in place regarding your data and its use as set out in this policy.
- 12.4. Nonetheless, the Company shall comply with the Nigeria Data Protection Regulation, 2019 (the **Regulation**) and any transfer of personal data which is undergoing processing or is intended for processing after transfer to a foreign country or an international organisation shall take place subject to the provisions of the Regulation. In addition, we have taken steps outlined above to try to improve security of your information. By submitting your information, you consent to these transfers.
- 12.5. It is also important that the personal data we hold about you is accurate and current. Thus, we request that you please keep us informed if your personal data changes during the course of your relationship with us.

13. **SECURITY**

- 13.1. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted [using SSL technology or anyone technically agreed upon]. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 13.2. Unfortunately, the transmission of information via the internet is not completely secure. Although, we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent unauthorized access.

14. **DATA RETENTION**

- 14.1. We will only retain your personal data for as long as is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your

personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

- 14.2. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

15. HOW TO CONTACT THE COMPANY

We welcome your views about our website and our privacy policy. If you like to contact us with any queries or comments, you may contact us as follows:

14 Chivita Avenue, Ajao Estate,
Lagos, Nigeria, West Africa.

info@clicktgi.net

234-01-9039000