

Privacy Policy

Who we are

(The Website) is operated by inq. Digital Nigeria Limited (“inq.”) and the address of inq. Digital Nigeria Limited’s head office is 3A Aja Nwachukwu Close, Ikoyi, Lagos, Nigeria.

References to “we”, “us”, “our” and “ours” in this privacy policy mean inq.

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Reference to “inq. Group” means inq. Group and any company or other organisation in which inq. Group owns.

The terms “you”, “your” and “yours” when used in this privacy policy mean any user of this Website.

Purpose of this privacy policy

We are committed to the privacy and confidentiality of information provided to us. This privacy policy provides information to help you understand how we collect, use and share your personal information and our privacy practices with regard to any personal information collected by us from you directly and/or through the website or the use of our products and services.

Personal information means information that identifies you and includes information such as your name, email address, telephone number and password, as well as any other personal data collected.

By visiting this Website and communicating electronically with us, you consent to the processing and transfer of your personal information as set out in this privacy policy.

Notification of Changes to Privacy Policy

We are continually improving our methods of communication and adding new functionality and features to our website and to our existing services. Because of these ongoing changes, changes in the law, and the changing nature of technology, our data protection practices will change from time to time. If and when our data protection practices change, we will update this privacy policy to describe our new practices. If we do, we will notify you next time to visit this site. We encourage you to check this page regularly.

Collecting your personal information

We are committed to informing and limiting the collection of essential personal information.

We can get your personal information when you:

- Buy a product or service from us (including online purchases).
- Register for a specific product or service (such as registering your name, phone number, email address and physical address details for any of our services).
- Subscribe to newsletters or other services from us.
- Ask us for more information about a product or service or contact us with a question or complaint.
- Take part in a competition, prize draw or survey.
- Use our network and other inq. products or services.
- Visit or browse our website or other inq. Group websites.

With your permission or consent and/or as permitted by law, we may also collect information about you from other organisations or third parties if this is appropriate and allowed by law.

These include fraud-prevention agencies, business directories, credit reference agencies.

Understanding what you want (the use of cookies)

We might also use cookies (small text files stored in your browser) and other techniques such as web beacons (small, clear picture files that follow your movements on our website). These collect information that makes the website remember you and tells us how you use our website, web-related products and services.

This, in turn, helps us make our website relevant to your interests and needs. They also help us find information once you have logged in or help us link your browsing information to you and your personal information, for example, when you choose to register for a service. We may use a persistent cookie (that stays linked to your browser) to record your details so we can recognise you if you visit our website again.

Cookies by themselves cannot be used to discover your identity. Cookies do not damage your computer. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. If you choose not to accept cookies from our website, this may limit its functionalities or performance.

Anonymous data collected through this Website

In addition to the information we collect as described above; we use technology to collect anonymous information about the use of our website. For example, our web server automatically logs which pages of our website our visitors view, their IP addresses and which web browsers our visitors use. This technology does not identify you personally; it simply enables us to compile statistics about our visitors and their use of our website.

Our website contains hyperlinks to other pages on our website. We may use technology to track how often these links are used and which pages on our website our visitors choose to view. Again this technology does not identify you personally – it simply enables us to compile statistics about the use of these hyperlinks.

Likewise, if you reached our website by clicking on a link or advertisement on another website, we also log that information. This assists us to maximise our Internet exposure as well as understanding the interests of our users. All of this information is collected and used only in the aggregate: it is entered into our database, where we can use it to generate overall reports on our visitors, but not reports about individual visitors.

We also use your IP address to help diagnose problems with our server and to administer our website. An IP address is a numeric code that identifies your computer on a network, or in this case, the Internet. Your IP address is also used to gather broad demographic information. We may also perform IP lookups to determine which domain you are coming from to more accurately gauge our users' demographics.

The personal information we collect

The information we collect about you depends on the inq. products and services you use and subscribe to. It includes (but isn't limited to) the following:

- Your name, date of birth, phone number, physical address, account information and email address.

- Your preferences for particular products, services or lifestyle activities when you tell us what they are – or when we assume what they depend on how you use our products and services.
- Your contact with us – such as a note or recording of a call you make to one of our contact centres, an email or letter you send to us or other records of any contact you have with us.
- Your account information – such as phone number, CPE type, dates of payment owed and received, the subscription services you use or any other information related to your services account with inq.
- We'll also get information on how you use our products and services, such as:
- The date, time and length of the calls and messages you send or receive through our network, and your approximate location at the time these communications take place.
- The level of service you receive – for example, network faults and other network events which may affect our network services.
- Your website browsing information (which includes information about the websites you visit), and about how you use our Website or other inq. Group websites on your mobile or a PC.
- The date, time and length of your internet browsing and your approximate location at the time of browsing

Use and analysis of your personal information

We may use and analyse your information to:

- Process the products and services we provide to you and keep you updated with the progress of your services.
- Keep you informed generally about new products and services (unless you choose not to receive our marketing messages).
- Provide the relevant service or product to you. This includes other services not included in your agreement with us, and to contact you with messages about changes to the service or product.
- Bill you for using our products or services.
- To administer this website and help us improve our services.
- Respond to any questions or concerns you may have about using our network, products or services.
- Let you know about other companies' products and services we think may interest you (including offers and discounts we've specially negotiated for our customers).
- Understand how you use our network, products and services. That way, we can develop more interesting and relevant products and services, as well as personalising the products and services we offer you.
- Carry out research and statistical analysis including to monitor how customers use our network, products and services on an anonymous or personal basis.
- Prevent and detect fraud or other crimes, recover debts or trace those who owe us money.
- Provide aggregated reports to third parties (such reports do not contain any information which may identify you as an individual).

We'll store your information for as long as we have to by law. If there's no legal requirement, we'll only store it for as long as we need it.

Sharing your personal information

We may share information about you with:

- Companies in the inq. Group.
- Partners or agents who provide support services in delivering the products and services we provide to you.
- Partners or agents that conduct network performance and customer satisfaction surveys and any other surveys related to the products or services provided to you.
- Companies who are engaged to perform services for, on behalf of inq. Digital Nigeria Limited.
- Where applicable, credit reference, fraud prevention or business scoring agencies, or other credit scoring agencies.
- Debt collection agencies or other debt recovery organisations.
- Law enforcement agencies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law.
- Emergency services (if you make an emergency call), including your approximate location.
- We'll release information if it's reasonable for the purpose of protecting us against fraud, defending our rights or property, or to protect the interests of our customers.
- If we're reorganised or sold to another organisation, we may transfer any personal information we hold about you to that organisation as part of the re-organization.

We may share, transfer or disclose the information in our databases and server logs to comply with a legal requirement, for the administration of justice, interacting with anti-fraud databases, to protect your vital interests, to protect the security or integrity of our databases or this website, to take precautions against legal liability, or in the event of our flotation on a stock exchange, sale, merger, re-organisation, dissolution, disposal of all or part of our assets or similar event. We will inform you of any such transfer or disclosure if we are required to do so by law.

Where appropriate, before disclosing personal information to a third party, we contractually require the third party to take adequate precautions to protect that data and to comply with applicable law.

Transfer of information abroad

If you are visiting this website from a country other than Nigeria the various communications will necessarily result in the transfer of information across international boundaries.

We may also need to transfer your information to other inq. group companies or service providers in countries outside Nigeria in which case we will fully comply with applicable data protection legislation. This may happen if you use our services and products while visiting countries outside Nigeria.

Keeping your personal information secure

We are committed to implementing leading data security safeguards.

We have specialised security teams who constantly review and improve our measures to protect your personal information from unauthorised access, accidental loss, disclosure or destruction.

If we have a contract with another organization to provide us with services or a service on our behalf to process your personal information, we will ensure that your information is protected and that they only process your information in the way we have authorized them to. These organisations will not be entitled to use your personal information for their own purposes. If necessary, our security teams will check them to make sure they meet the security requirements we have set.

Communications over the internet (such as emails) are not secure unless they have been encrypted. Your communications may go through a number of countries before being delivered – as this is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of personal information that's beyond our control.

We'll never ask for your secure personal or account information by unsolicited means of communication. You're responsible for keeping your personal and account information secure and not sharing it with others.

You may choose to disclose your information in certain ways, such as social plug-ins (including those offered by Google, Facebook, Twitter and Pinterest) or using third-party services that allow you to post reviews or other information publicly, and a third party could use that information. Social plug-ins and social applications are operated by the social network themselves and are subject to their own terms of use and privacy and cookies policies. You should make sure you're familiar with these.

How to unsubscribe from marketing messages

If you no longer want to receive marketing messages from us, please contact our customer service team, and you'll be 'opted out'. (you can get in touch with customer services through the Contact Us page on our website.). If you choose to unsubscribe or opt-out, we will hold your contact details on file marked so that we do not contact you again. This is so that we do not contact you if your details are subsequently provided to us by a third party.

Access and corrections to personal information

Under the law, you have the right to access, correct, amend, delete your personal information or to object to the processing of your personal information.

Upon receipt of your written request and enough information to permit us to identify your personal information, we will disclose to you the personal information we hold about you, for which we may make a charge as allowed by applicable law. We will also correct, amend or delete any personal information that you tell us is inaccurate and notify any third party recipients of the necessary changes. You may update any information you have given to us by contacting us at our registered address. Requests to delete personal information are subject to any applicable legal and ethical reporting or document retention obligations imposed on us.

Unauthorised third party access to your information

Despite the security measures we have in place to protect your personal information (firewalls, password access and encryption methods), you acknowledge that it may be accessed by an unauthorised third party, e.g. as a result of illegal activity.

Links to other websites

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third-party websites or any association with their

operators. We do not control these websites and are not responsible for their data or privacy practices. We urge you to review any privacy statement posted on any site you visit before using the site or providing any personal information about yourself and others.

Governing law

The laws of the Federal Republic of Nigeria will govern any dispute or claim arising out of or relating to your use of this website.

Feedback

We welcome comments about this privacy policy. If you have any questions about this privacy policy or any part of our service, you may contact us by sending an email to our Data Protection Officer via ijeoma.ezeh@inq.inc or send your comments to the address set out in paragraph 1 of this privacy policy. We will store any correspondence from you at our offices.

Complaints

Should you believe that inq. Digital Nigeria Limited has utilised your personal information contrary to applicable law; you undertake to first attempt to resolve any concerns by sending an email to our Data Protection Officer via ijeoma.ezeh@inq.inc. If you are not satisfied with this process, you have the right to lodge a complaint with the National Information Technology Development Agency (NITDA) and/or the Nigerian Communication Commission.