

# Privacy Policy

This Privacy Policy was last updated in June 2023.

The policy relates to the SuccessBridge platform, and all user data collected and managed through the platform or print to deliver SuccessBridge Services. If you use SuccessBridge... Services (a "User") This policy applies to you, and you are bound by it. If you disagree you must stop using SuccessBridge Services and close your account.

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## 1. Our commitment

Community NetHUBs Africa trades as "SuccessBridge", and is in Shasha, Lagos State. SuccessBridge respects users' rights about their privacy and information, taking great care with any personally identifying information. As a native-domiciled entity, the SuccessBridge platform or print is subject to the laws of Nigeria and the regulations of the African Union. The Cyber Security and Personal Data Protection and Nigeria Data Protection Regulation (NDPR) in Nigeria apply to the safeguarding and processing of personal data that could be used to identify any citizens of the African Union. SuccessBridge is committed to complying with its legal obligations in this regard, not just to data subjects (Users) in the African Union. but to extend the same courtesy to all SuccessBridge Users worldwide.

This policy is based on obligations created through Cyber Security and Personal Data Protection in the African Union and other equivalent legislation worldwide such as the Nigeria Data Protection Regulation (2019) in Nigeria.

## 2. Collection, Processing, and storage of Data

The SuccessBridge platform or print may collect and process personal data relating to past and present users and learners in the course of business. SuccessBridge collects data directly from the User input but also in automated ways such as through system logs, cookies, web beacons, and integration with third-party service providers. Processing of data includes: collecting; recording; storing; altering; disclosing; destroying; and blocking. This policy governs SuccessBridge's approach to data and does not apply to any third-party organizations which may have integrated their systems to the SuccessBridge platform.

### 3. Personally-Identifying Information (PII)

Personally Identifying Information (PII) may be required to uniquely identify a User upon Registration (e.g., a personal email address) and other information may be required to complete purchases and receive a certification if requested. You may also be invited to create a personal profile and resumé (including date of birth, existing education, work experience, and career ambitions) and to generate or supply other personal information (such as completing personality, psychometric, and workplace assessments) to build out your profile to determine your suitability for different careers, job opportunities and to establish your own tailored learning pathway. You will have the option to share or unshare some or all of this information in your own public profile.

Personal data is stored within your user account on the platform or print and access is completely restricted via encrypted networks and access permissions in order to ensure the highest levels of confidentiality and protection. No personal data is available to download or remove from the platform or print by employees or third parties, and SuccessBridge ensures that only authorized personnel have online access to a User's account data.

Users may decide to post comments on the SuccessBridge Website or interact with other Users in a way that is public or widely available to SuccessBridge Users through postings, sharing, course reviews, direct communications, giving testimonials, uploading photos, or commenting on different parts of the SuccessBridge platform or print ("Shared Content" or "Public Posting"). SuccessBridge will collect and store Public Postings and Shared Content which will become publicly available or viewable by others. When you share content or make a public posting you are consenting to grant SuccessBridge a non-exclusive right and license to reproduce, distribute, publicly perform, offer, market, and otherwise use and exploit the Public Postings and Shared Content. However, SuccessBridge is not responsible for how other Users may use such publicly available information or otherwise be accessible to others who have access to the Services. Users are expected to use their discretion when making such posts. In the event that a User is selected as "Outstanding Community Member of the Day" or "Outstanding Community Member of the Month", the User agrees to allow SuccessBridge to publish their Registration Information (except for your email address), Profile Information, and Course Information as well as your response to the accolade for marketing purposes and/or via SuccessBridge Services.

### 4. Course information

After registration, a User can enroll in a course offered by SuccessBridge or its affiliated Publishers or Alternative Platforms. Aggregated data on age, gender (where available), and country of origin is shared with affiliated Publishers or Alternative Platforms relating to the Users enrolled in the courses they teach and is subject to a legal agreement between SuccessBridge and each individual Publisher. There is no way for a Publisher to access or derive User level information from this aggregated information.

SuccessBridge processes certain data relevant to the publication and playback of course content by Publishers or Alternative Platforms and learners. Certain data is collected to ensure Users, Publishers, or Alternative Platforms and learner progress are uniquely identified and accurate records are maintained in order to deliver the SuccessBridge learning service and to comply with relevant legal obligations. This will include regular emails to keep Users informed of their progress and make various suggestions and recommendations. Patterns of usage behavior and course

content evaluation are also collected and stored as metadata to help SuccessBridge and Publishers or Alternative Platforms improve the services and offer the most appropriate content and courses to registered Users.

#### 5. Third party information processors and service providers

All User personal data is stored securely on third-party cloud-based electronic storage and safeguarded. User purchases of physical goods require a home delivery address to process orders. SuccessBridge uses payment processing and fulfillment partners who will receive sensitive PII to enable payment collection and when necessary, physical fulfillment. Highly sensitive data, such as credit card information and passwords are never received by SuccessBridge (e.g., when you allow third-party authentication via your social media sign-on, or by choosing third-party payment providers such as Opay, or GTCO, that isolate SuccessBridge from your payment details). Recurring payment details are stored by a third-party payment provider that you choose and not by Alison. Although SuccessBridge (in the future) will allow Users to register with their social media single sign-on (such as Facebook, Google, LinkedIn etc.) the information available on these third-party platforms is governed by their terms and information-sharing practices. SuccessBridge only takes the necessary information from these social platforms (i.e., your name, email address, and country for legitimate purposes) and does NOT take any other personal or social information on your friends and contacts from these platforms.

SuccessBridge tests and operates a number of analytical tags, scripts, and tracking pixels (also known as web beacons) from third-party providers such as Google, Facebook, Bing, and Hotjar) to enable browser and mobile analytics that measure page views and sessions. This helps SuccessBridge understand User behaviors as the visit, navigate and leave the SuccessBridge platform.

SuccessBridge provides free learning supported through advertising services managed by third parties. SuccessBridge both buys online ads and sells online ads through third party providers (e.g., Google AdWords, Bing, Facebook Ads and Google AdSense). Cookies and tracking pixels are used by advertising service providers as independent third-party data controllers to enable personalized advertising to the User based on intent, search history and demographics built up by advertising service providers over time. SuccessBridge has no access to these third-party cookies or tracking technology nor any control over how third-party advertising service providers use the data they collect.

#### 6. Technical data collection

As an internet-based service, web server log files are also collected and monitored for usage and behavior patterns over time. User device information and IP addresses are also collected to understand platform or print traffic flows and how each User interacts with SuccessBridge Services and to ensure the right balance of technical support, customer service resources, and device expertise is available to Users.

SuccessBridge also stores and uses cookie information (a piece of text saved on each User's device) to help track unique user sessions, to personalize SuccessBridge Services for the User. SuccessBridge stores Preference, Security, Functional and Session cookies to tailor the user experience, securely automate User login and enable purchase transactions. SuccessBridge uses

web beacons to help monitor email communications with our registered Users to understand which messages are successfully delivered and read.

#### 7. User consent and self-service control

By using SuccessBridge Services and directly inputting your information on the platform, you the User are consenting to the collection and use of your data by Alison. You have full access to your information through your user account and are responsible for ensuring that you keep your personal details up-to-date through the platform. You have the power to modify your personal data and the power to deactivate your account and request the removal of your personally identifiable information when you delete your account. You may modify your email client, browser settings or use browser add-ons to control how cookies, beacons and other third-party services work. Privacy settings are also provided on your mobile device operating system to give you more control over your data. Reducing the level of data shared and advertising options may reduce the quality of, or disable, some or all SuccessBridge services.

To understand and control how the digital advertising industry uses your data please visit the Network Advertising Initiative's Consumer Opt-Out link or the Digital Advertising Alliance's Consumer Opt-Out link. These help you to opt-out of receiving tailored advertising from companies that participate in those programs. To opt out of Google Analytics for display advertising or customize Google display network ads, You can visit the Google Ads Settings page. Opting out means that your personal data is not used to personalize ads. Opting out does not mean you will not receive ads. SuccessBridge has no affiliation nor control over these industry initiatives and how you use these tools is your own responsibility.

SuccessBridge recognizes the privacy interests of children. Parents and guardians need to take an active role in their children's online activities and interests. Digital consent is generally not legally recognized for children under the age of 13, or under the age of 16 where such children reside in the African Economic Area. Parents and legal guardians should not allow their children defined as such to register, enroll and learn on the SuccessBridge platform or print without full-time supervision. SuccessBridge reserves the right to delete any User account that we discover was created by a child unable to give digital consent. If a parent or guardian discovers that SuccessBridge has unlawfully collected personal information from a child, please contact our data protection officers who will take all reasonable steps to delete such information promptly.

#### 8. Retention of data

SuccessBridge is under a legal obligation to keep certain data for a specified period. Furthermore, SuccessBridge aggregates data and anonymizes User accounts that are deleted so that it is no longer reasonably associated with an identified or identifiable natural person. Such Other Information is used by SuccessBridge for other relevant business purposes for as long as necessary. This may include keeping Other Information after the User has deleted their account for whatever period of time needed for SuccessBridge to pursue its legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce commercial agreements.

#### 9. Security and disclosure of data

The organization will take all reasonable steps to ensure that appropriate security measures are in place to protect the confidentiality of electronically stored data. The platform or print is large and

public and subject to regular attacks by hackers. The platform or print has been hardened extensively over time however no online system is perfect or immune from a breach. SuccessBridge has appropriate security measures in place to protect against unauthorized access. Safeguards are applied to the processing and retention of data. These include:

- Limitations on access to prevent unauthorized consultation, alteration, disclosure, or erasure of personal data.
- Strict time limits for the erasure of personal data in line with our retention policy.
- Logging mechanisms to permit verification of whether and by whom personal data has been consulted, altered, disclosed, or erased.
- Pseudonymization, anonymization, and encryption.
- The platform or print databases are not accessible directly by employees or software developers other than authorized DevOps administrators. Multi-factor authentication is required for all authorized DevOps administrators to ensure access to sensitive data is restricted to the maximum possible.
- Security measures will be reviewed from time to time, having regard to the technology available, the cost, and the risk of unauthorized access.
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Customer Support employees will have access to a certain amount of personal data relating to users and other third parties. Employees must not disclose User's personal data, except where necessary in the course of their employment or in accordance with law. They must not remove or destroy personal data except for lawful reasons and with the permission of the organization. Any breach of the data protection principles is a serious matter and may lead to disciplinary action up to and including dismissal. All SuccessBridge employees must adhere to the following data protection principles:

- Process data fairly, lawfully, and transparently.
- Keep data only for specified, explicit and legitimate purposes.
- Process data only in ways that are compatible with the purposes for which it was given.
- Ensure data is accurate and up-to-date.
- Ensure data is adequate, relevant, and limited to what is necessary for the purpose for which it was given.
- Keep data safe and secure.
- Retain personal data for no longer than is necessary for the purpose for which it is processed and in line with the company's data retention policy.

Users have an obligation to keep their User account credentials sufficiently strong, protected for safe-keeping and private to themselves to prevent unauthorized access. Users must monitor and control all activity on their accounts. If you suspect a breach of your account, please change your password immediately and contact SuccessBridge customer support so that the impact can be minimized.

Were a data breach to occur and if such a breach puts individuals' personal rights and freedoms at risk and SuccessBridge is unable to contain those risks, all affected individuals will be notified expeditiously. Furthermore, SuccessBridge's data protection officers will inform the Data Protection Commissioner in Nigeria so that they are aware and can monitor the response.

## 10. Data Protection Officers

The directors of the company are ultimately responsible for your data and have nominated a named Data Protection Officer for SuccessBridge (“DPO”). The DPO is responsible for assisting the organization in monitoring and maintaining compliance with data protection legislation.

Please email your data protection and privacy queries or concerns to [thesbworks@dnsafrica.org](mailto:thesbworks@dnsafrica.org), with the subject: DPO Issues.

## 11. Access requests

Users across the world may have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete or correct this Information. Your SuccessBridge User Account provides the settings and self-service tools needed for these requests. Please contact SuccessBridge Customer Services if you wish to get a complete copy of all your electronic data held about you as a User. If a User opts to delete their User account, SuccessBridge will delete all PII, Profile, and Resumé data, and will irreversibly anonymize their learner record.

There is no charge to use Alison’s User account self-service tools. However, the company reserves the right to charge a fee to process any further Subject Access Request. The organization will, in most circumstances, provide this data within one month. In some cases, due to the complexity of the request or the number of requests being handled by the organization, the organization may require a further two months to provide this data.

Users are only entitled to access data about themselves and will not be provided with data relating to other users or third parties. However, some user data may have been disclosed publicly on SuccessBridge forums for example. It may be possible to block out User data relating to a third party or conceal the User’s identity, and where this is possible the organization will endeavor to do so. A user who is dissatisfied with the outcome of an access request has the option of referring a complaint to the office of the Data Protection Commissioner in Ireland.

Office of the Data Protection Commissioner  
SuccessBridge Hub,  
90A, Abule-Iroko Road,  
Olaore Bus Stop, Ajegunle-Ilo.

**Phone:** +234 808 911 8151

**Email:** [tthesbworks@dnsafrica.org](mailto:tthesbworks@dnsafrica.org)

## 12. Right to object

Users may have the right to object to data processing that is causing them distress and/or to make corrections to personal data which is inaccurate. Where such objection is justified, the organization will cease processing the data unless it has a legitimate interest that prevents this. SuccessBridge will make every effort to alleviate the distress caused to the individual. An objection should be made in writing to the Data Protection Officer, outlining the data in question and the harm being caused.

### 13. International transmission of data

Based in Nigeria, SuccessBridge operates on a regional basis, and it may be necessary for the course of business to collect or transfer User personal data across state boundaries, to share data with other group companies in countries outside the European Economic Area, and to share information with third-party service providers. The transfer of such data is deemed necessary for the management and administration of your User Account and delivery of SuccessBridge Services. Some states do not have comparable data protection laws to Nigeria or the AU. When the data transfer is necessary, SuccessBridge will take steps to ensure that the data has an equal level of protection as it would in Nigeria or as expected within other leading international jurisdictions. Furthermore, SuccessBridge will only transmit data to companies that agree to guarantee the same level of protection. For more information, please contact Successbridge's Data Protection Officers.

### 14. Policy review and modification

SuccessBridge has completed a Data Protection Impact Assessment and put the necessary policy and procedures in place to minimize risks to users' data privacy and maximize data protection. This policy will be reviewed from time to time to take into account changes in the law and the experience of the policy in practice. Updates will be posted to the website when available. Material updates will be circulated to each User via the registered User email on the User Account. Continued usage of the SuccessBridge Service is deemed to be User acceptance of this policy as permitted by applicable law.

## **SuccessBridge Cookies Policy**

Effective Date: June 03, 2023.

### **What are cookies?**

Cookies are small text files placed onto your computer or device as you browse the Internet. Cookies can be used to collect, store and share bits of information about your activities across websites and services, including on SuccessBridge. They also allow us to remember things about your visit to Alison, such as your preferred language and other choices/settings, and generally make the site easier for you to use.

SuccessBridge uses both session cookies and persistent cookies. A session cookie is used to identify a particular visit to SuccessBridge. These cookies expire after a short time, or when you close your web browser after using SuccessBridge. We use these cookies to identify you during a single browsing session, such as when you log into SuccessBridge. A persistent cookie will remain on your devices for a set period of time specified in the cookie. We use these cookies when we need to identify you over a longer period of time. For example, we would use a persistent cookie if you asked that we keep you signed in.

### **Why does SuccessBridge use cookies and similar technologies?**

SuccessBridge uses cookies and similar technologies, such as web beacons, browser cookies, pixel tags, or local shared objects ("flash cookies"), to deliver, measure, and improve our services in various ways. We use cookies both when you access our site and services on a browser, as well as through our native mobile app. As we adopt additional technologies, we may also gather additional information through other methods.

We use cookies for the following purposes:

Authentication and security:

- To log you into SuccessBridge.
- To protect your security.  
and
- To help us detect and fight spam, abuse, and other activities that violate Alison's agreements and terms.

For example, these technologies help authenticate your access to SuccessBridge and prevent unauthorized parties from accessing your accounts.

Preferences:

- To remember information about your browser and your preferences.  
and
- To remember your settings and other choices you have made.

For example, cookies help us remember our preferred language or the country that we are in. We can then provide you with content in your preferred language without having to ask you each time you visit Alison.

Analytics and research:

- To help us improve and understand how people use Alison.

For example, cookies help us test different versions of SuccessBridge to see which particular features or content users prefer. We may include web beacons in e-mail messages or newsletters to determine whether the message has been opened and for other analytics. We might also optimize and improve your experience on SuccessBridge by using cookies to see how you interact with Alison, such as when and how often you use them and what links you click on.

To help us better understand how people use Alison, we work with a number of analytics partners, including Google Analytics. These providers use cookies and similar technologies to help us analyze how users use the Services, including by noting the third-party Services from which you arrive. The information collected will be disclosed to or collected directly by these service providers, who use the information to evaluate your use of Alison. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-Out plugin by clicking [here](#).

We don't release the information collected from our cookies to any third parties, other than to our service providers who assist us in these activities.

Personalized content:

- Customize SuccessBridge with more relevant content.

Advertising:

- To provide you with more relevant advertising.



As explained further in our Privacy Policy, third parties whose products or services are accessible or advertised via SuccessBridge may use cookies to collect information about your activities on the Services, other sites, and/or the ads you have clicked on. This information may be used by them to serve ads that they believe are most likely to be of interest to you and measure the effectiveness of their ads. Targeting and advertising cookies we use may include Google Analytics, Google AdSense, and Doubleclick for Publishers or Alternative Platforms as well as other advertising networks and services we use from time to time.

For more information about targeting and advertising cookies and how you can opt-out, you can visit [allaboutcookies.org/manage-cookies/index.html](http://allaboutcookies.org/manage-cookies/index.html). Please note that to the extent advertising technology is integrated into Alison, you may still receive advertising content even if you opt out of tailored advertising. In that case, the advertising content will just not be tailored to your interests. Also, we do not control any of the above opt-out links and are not responsible for any choices you make using these mechanisms or the continued availability or accuracy of these mechanisms.

When accessing SuccessBridge from a mobile application, you may also receive tailored in-application advertisements. Each operating system, such as iOS and Android, provides instructions on how to prevent the delivery of tailored in-application advertisements. You may review the support materials and/or the privacy settings for the respective operating systems to opt out of tailored in-application advertisements. For any other devices and/or operating systems, please visit the privacy settings for the applicable device or operating system or contact the applicable platform or print operator.

#### What are my privacy options?

You have a number of options to control or limit how we and our partners use cookies.

- This cookie policy is available at our website <https://dnsafrica.org/comnethubs/> ; By continuing to use or access SuccessBridge, you are consenting to our use of cookies and related technologies as described in this Cookies Policy.
- Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies by visiting the Help portion of your browser's toolbar. If you choose to decline cookies, please note that you may not be able to sign in, customize, or use some of the interactive features of SuccessBridge.
- Flash cookies operate differently than browser cookies, and cookie management tools available in a web browser will not remove flash cookies. To learn more about how to manage flash cookies, you can visit the Adobe website and make changes at the Global Privacy Settings Panel.
- For general information about cookies and how to disable them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### Changes to this Policy

We will notify you of any changes by posting the new Policy on SuccessBridge with a new effective date. If we make a material change to this Policy, we will take reasonable steps to notify you in advance of the planned change.

#### Questions

If you have any questions about our use of cookies, please email us at [thesbworks@dnsafrica.org](mailto:thesbworks@dnsafrica.org).