

**St. Stephen's Capital**  
(Trade & Technology Initiatives - TTI<sup>©</sup>)

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# PRIVACY POLICY

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St. Stephen's Capital promise to respect any personal or company data you share with us. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect. For more information please read our privacy policy.

## WHAT THIS POLICY COVERS

The purpose of this privacy policy is to give you a clear explanation about how St. Stephen's Capital and all its divisions, associates, and affiliated businesses use the personal and company information you provide to us and that we collect, whether online, via phone, e-mail, in forms, letters or in any other correspondence or from third parties.

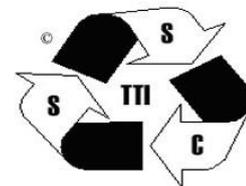
We ensure that we use your information in accordance with all applicable laws concerning the protection of personal and company information. This policy explains:

- What information St. Stephen's Capital may collect about you or your company and how we collect it
- How we will use that information
- Whether we disclose your details or your company details to anyone else
- Your choices regarding the information you provide to us

If you have any queries about this please contact [dataprotection@saintstephenscapital.com](mailto:dataprotection@saintstephenscapital.com)

## WHO WE ARE

St. Stephen's Capital is a full fledge business development consulting firm. This policy covers all the work, associates and affiliates of St. Stephen's Capital worldwide.



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### **HOW WE COLLECT DATA**

We collect information in the following ways:

1. When you give it to us **DIRECTLY**
  - You may give us your information for the following reasons:
    - to receive e-mail updates, newsletters or campaigns
    - to subscribe or purchase one of our publications
    - to complete a census or survey form
    - to register for any of our courses and programmes
    - to volunteer or serve as an intern in one of our offices
    - to receive or purchase services from us
2. When you give it to us **INDIRECTLY**

Your information may be shared with us by independent organisations. These independent third-party organisations will only do so when you have indicated that you are happy for your details to be passed on to us. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

We collect information about the online services you use and how you use them, like when you open or click a link in one of our e-mails, watch a video on YouTube, visit our websites or view and interact with our social media.

### **WHAT DATA WE COLLECT**

The type and quantity of information we collect and how we use it depends on why you are providing it.

#### **1. Subscribers**

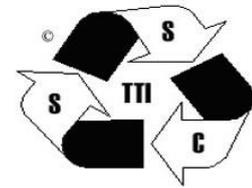
If you subscribe to a newsletter we will collect:

- Your name
- Your contact details

#### **2. Supporters**

If you or your company support us, for example volunteer, sign up for an event or enrol in any of our courses and/or programmes, or purchase any of our services, we will usually and routinely collect:

- Your name and/or your company name
- Your contact details and/or that of your company
- Your age and/or date of birth



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- Your occupation
- Your marital status
- Your photograph
- Your ethnic background
- Your religious affiliation/s
- Your family members' names and ages
- Length of time in previous establishments
- Your bank and/or credit card details, and/or that of your company
- Information on your experience of courses or programmes
- Information relating to your health, disability, and dietary preferences
- Information on your reasons for attending a course or programme

We retain records of events, courses or programmes you have attended.

If you use your credit or debit card to buy something or pay for a registration online or over the phone, we will ensure that this is done securely and in accordance with the Payment Card Industry Data Security Standard. You can find out more information about PCI DSS on their website

[https://www.pcisecuritystandards.org/security\\_standards/index.php](https://www.pcisecuritystandards.org/security_standards/index.php)

We do not store your credit or debit card details at all, following completion of your transaction. All card details and validation codes are securely destroyed once the payment has been processed. Only staff authorised and trained to process payments will be able to see your card details.

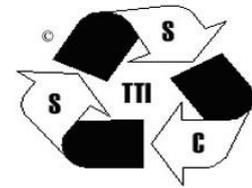
### **SENSITIVE DATA**

Data Protection Law recognises that certain categories of personal information are more sensitive. This is known as sensitive personal data and covers health information, race, and religious beliefs. We do not usually collect 'sensitive personal data' about our supporters unless there is a clear reason for doing so, such as ensuring your needs are met and/or ensure we match you with an appropriate course or programme.

### **WHY WE COLLECT DATA**

We will mainly use your data to:

- Provide you with the services, products or information you ask for
- Administer your payments for services and products you purchase from us



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- Let you know about new services and products, and ways you can support us
- Keep a record of your relationship with us
- Ensure we know how you prefer to be contacted
- Understand how we can improve our services, products or information

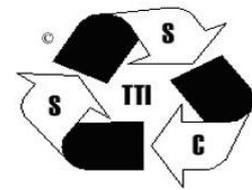
### **HOW WE SHARE DATA**

We will not normally share your data or your company's data with other organisations. We will only share your information or your company's information if:

- We are legally required to do so, e.g. by a law enforcement agency legitimately exercising a power or if compelled by an Order of the Court
- We believe it is necessary to protect or defend our rights, property or the personal safety of our people or visitors to our premises or websites
- We are working with a carefully-selected partner that is carrying out work on our behalf. These partners may include mailing houses, IT specialists, web hosting providers, insurance companies, financial institutions and reference agencies. The kind of work we may ask them to do includes but not limited to processing, packaging, mailing, delivery, sending postal mail, e-mails and text messages, carrying out research or analysis, processing payments and conducting references. We only choose partners we can trust. We will only pass personal data to them if they have signed a contract that requires them to:
  1. abide by the requirements of the General Data Protection Regulation
  2. treat your information as carefully as we would
  3. only use the information for the purposes it was supplied (and not for their own purposes or the purposes of any other organisation)
  4. allow us to carry out checks to ensure they are doing all these things

We will only ever share your data or your company's data in other circumstances if we have your explicit and informed consent.

We will never share, sell or swap your details or your company's details with any third parties for the purposes of their own marketing or the monetising of your data or your company's data.



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### **HOW WE STORE DATA**

We store information on computers located in the UK, US and Nigeria. We may transfer data to our reputable third-party suppliers as explained above. They may be situated inside or outside the European Economic Area. We may also store information in paper files.

We place great importance on the security of all personally identifiable information associated with our supporters, subscribers and users. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal and/or company data under our control. For example, only authorised personnel are allowed to access user information.

While we cannot ensure or guarantee that loss, misuse or alteration of data will not occur while it is under our control, we use our best efforts to try to prevent this.

Unfortunately, the transmission of data across the internet is not completely secure and whilst we do our best to try to protect the security of your information we cannot ensure or guarantee that loss, misuse or alteration of data will not occur whilst data is being transferred.

Where you or we have provided a password enabling you to access parts of our website it is your responsibility to keep this password confidential. Please don't share your password with anyone.

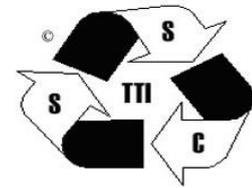
We will keep your information only for as long as we need it to provide you with the services or information you have required, to administer your relationship with us, to inform the preferences of our supporters, to comply with the law, or to ensure we do not communicate with people that have asked us not to.

When we no longer need information we will always dispose of it securely, using specialist companies if necessary to do this work for us.

### **YOUR RIGHTS**

The General Data Protection Regulation gives you certain rights over your data and how we use it. These include:

- the right in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed
- the right to prevent your data being used for direct marketing



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- the right of access to a copy of the information we hold about you (known as a subject access request).

If you wish to exercise any of these rights please contact the responsible person in your region where we operate. For contact details see above Contact Us. If you are not sure who to contact please get in touch at [dataprotection@saintstephenscapital.com](mailto:dataprotection@saintstephenscapital.com) so we can direct your enquiry.

Subject access requests must be made in writing by post to the responsible person in your region where we operate with a description of the information you want to see and proof of your identity.

We do not accept subject access requests by e-mail so we can ensure that we only provide personal data to the right person.

We will respond within one month of receipt of your written request and confirmed ID. Please provide as much information as possible about the nature of your contact with us to help us locate your records. Please note it is our policy to charge the statutory maximum fee of £10.00p (or its equivalent in the region where you operate) for a subject access request.

Where you have provided your consent (or continuous implied consent) for our use of your personal information, you always have a right to withdraw your consent at any time.

For more information about your rights under the Data Protection Act go to the website of your region's Information/Data Commissioner's Office or equivalent, e.g. in U.K. <https://ico.org.uk/>