

Privacy Policy for Stears

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General

stears.co is provided by Stears Information Limited ("Stears").

Stears respects your privacy and is committed to protecting your personal data. This privacy policy ("Policy") will inform you on how we protect your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Throughout the website, the terms "we", "us" and "our" refer to Stears.

1. IMPORTANT INFORMATION AND WHO WE ARE

● Purpose of this privacy policy

This Policy aims to give you information on how Stears collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up for our newsletter, purchase a subscription or other service from Stears. This Policy applies to all our clients, potential clients, consultants, partners and every other person we hold information about.

All personal data that you provide us will be protected and kept confidential among our affiliates, representatives, and privies.

This Policy also sets out your rights and who you may contact for further information.

You agree to this Policy by visiting our website and when you use our services.

Your use of our services, and any dispute over privacy is subject to this Policy and our [Terms and Conditions](#), including its applicable limitations on damages and the resolution of disputes. Our Terms of Service are incorporated by reference into this Policy.

Our website and services are not directed at you if we are prohibited by any law of any jurisdiction from making the information on our website available to you and is not intended for any use that would be contrary to local law or regulation.

This website is not intended for children and we do not knowingly collect data relating to children.

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 Policy supplements other notices and privacy policies and is not intended to override them.

● Controller

Stears is the controller and is responsible for protecting your personal data and determining how it is processed.

We have appointed a Data Protection Officer ("DPO") who is responsible for implementing and overseeing questions regarding this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

● **Contact details**

If you have any questions about this Policy or our privacy practices, please contact Abdul Abdulrahim in the following ways:

Full name of legal entity: Stears Information Limited

Email address: support@stears.co

Postal address: 37b Shakiru Anjorin Street, Off Admiralty Road, Lekki Phase 1, Lagos Nigeria

Telephone number: +234 706 381 4918

● **Consent**

Where the processing of personal data is based on consent, we shall obtain the requisite consent at the time of collection of the personal data. In this regard, you consent to the processing of your personal data when you access our website, or use our services, content, features, technologies or functions offered on our website or other digital platforms. You can withdraw your consent at any time, but such withdrawal will not affect the lawfulness of the processing of your data based on consent given before its withdrawal.

● **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 30 December 2022. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

● **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. You further acknowledge and agree that we shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with use of or reliance on any such content, goods or services available on or through any such websites or services. When you leave our website, we encourage you to read the privacy policy of every website you visit through our website.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information that can be used to identify an individual. It does not include data pertaining to an anonymous individual.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Basic personal details – such as name, title and date of birth;
- Personal contact details – such as home address, delivery address, home phone number, mobile phone number, and email address;

- Work details – such as job title, department, company name, company address, work email address and office phone number;
- Login details – such as username, email address and password;
- Technical details - such as your IP address, your login data, browser type and version, time zone setting and location, operating system and platform, and other technology on the devices you use to access this website;
- Transaction details - such as information about payments to and from you and other details of products and services you have purchased from us;
- Usage details - such as information about how you use our website, products and services; and
- Marketing and communication details - such as information about your preferences in receiving marketing from us and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Policy.

We do not collect any **special categories of personal data** about you (this includes details about your race or ethnicity, gender, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

● If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a subscription). In this case, we may have to cancel a product or service you have with us but we will do our best to notify you if this is the case at the time.

3. HOW IS YOUR DATA COLLECTED?

There are different ways that data might be collected from or about you on stears.co, including through:

- **Direct interactions:** When you give us your basic or personal details by filling in forms or by corresponding with us by post, phone, email or otherwise.
- When you apply for our products or services;
- When you create an account on our website;
- When you subscribe to our service;
- When you request marketing information to be sent to you;
- When you enter a competition, promotion or survey; or
- When you give us feedback or contact us.
- **Automated technologies or interactions:** when you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this data by using cookies and other similar technologies.

- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources including social media websites.

We may also collect technical data from the following parties about or in relation to you such as:

- analytics providers including Google;
- search information providers such as Google;
- contact, financial and transaction data from providers of technical, payment and delivery services such as Paystack; and
- analytics from social media channels such as likes, shares and posts.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; and
- Where we need to comply with a legal obligation.

● **Purposes for which we will use your personal data**

We will only use your personal data for the purpose for which we collected it which may include the following:

- to register you as a new user;
- to process and deliver your subscription order;
- to manage your relationship with us;
- to recommend products or services which may be of interest to you;
- to help us identify and provide the type of service offerings in which you are most interested in;
- to enable us create the content most relevant to you and to generally improve our services;
- to make our website and other Stears' applications and platforms easier for you to use by not having to enter your information more than once;
- to manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities;
- for compliance with legal and regulatory obligations; and
- to send periodic emails and marketing materials regarding your interest in our products and services.

● **Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time at support@stears.co.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

● Cookies

Stears and its service providers, advertisers, ad technology providers and advertising servers may place, view, and/or use “cookies”, web server logs, web beacons, pixels or other electronic technologies to collect statistical and other information about you and your use of our website. This information may include information about the IP address of your computer, browser type, language, operating system, mobile device, device ID, geolocation data, the state or country from which you accessed our services, the webpages visited, the date and the time of a visit, the websites you visited immediately before and after visiting our site, the number of links you click while on site, the functions you use on this site, the databases you view and the searches you request on this site, the types of articles you read, the data you save on or download from this site and the number of times you view an advertisement.

We may use the information collected for various reasons, including research, analysis, to better serve visitors to our website (such as by enabling log-in, providing access to certain sections of this site, providing customised content or customised advertisements), to compile aggregate and anonymous information about usage of this site and other websites, other statistics, etc. However, if you have deleted and disabled cookies, these uses will not be possible to the extent they are based on cookie information. To opt out of Google Analytics, please click [here](#).

To assist us with the uses described in this Privacy Policy, information collected about you and your use of this site or other websites may be aggregated, analyzed or combined with personal or other information about you from other online or offline sources. If you prefer that we not combine non-personal information that has been collected, through cookies, about your use of this site or other websites with personal or other information about you, then please delete and disable cookies for each browser, on each computer you use to surf the Web.

To manage cookies, the help function on most browsers and mobile devices contains instructions on how to set your browser to notify you before accepting cookies, disable cookies entirely, or disable the collection of geo-location data. If you disable certain cookies or refuse to accept a request to place a cookie, it is possible that some parts of this site, such as certain areas you need to log in, will not function properly, and the advertising you receive when you visit this site may not be advertisements tailored to your interests.

● Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at support@stears.co.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

During the course of providing you with a service, we may disclose your personal information to the following third parties:

- **Service providers** – We engage service providers who help to support our business and improve our products. These service providers include, for example, fulfilment providers for delivery of our digital content and marketing; organisers and sponsors of our events and organisations that host our sites or databases.
- **Advertisers** – We, and our advertising partners, may use cookies to collect personal information and serve you with advertisements that we believe are relevant to you and your interests.
- **Institutional customers** – If your subscription is provided under a team subscription or trial, we may provide our client with information about your activity on stears.co for the purposes of user management, licence administration, content suggestion and billing. We may also make online tools available to our client for these purposes. We may also provide current or prospective clients with activity information about individual subscribers who registered using that entity's email address.
- **Social media providers** – Information will be shared with social media platforms where you log in to stears.co via a social media account, or use components on stears.co provided by social media platforms (e.g. the "Share on Facebook" function). We may also share the information of our subscribers with social media partners for the following reasons:
 - To prevent existing subscribers from being targeted with subscription offerings on social media platforms;
 - To create lookalike audiences for the purposes of targeted advertising on social media platforms; and
 - To encourage users to get the most out of their subscription.

Other users – stears.co is publicly accessible and anyone around the world who accesses stears.co will be able to see anything you post, such as comments about an article.

Stears group – We may share your information within the Stears group to provide our services and to better understand the relationship between our products.

Legal processes and successors in title – We may disclose your information to comply with applicable laws, court orders or other valid legal processes, and to enforce or apply our terms of use, any subscription agreement, or any of our other rights. We may transfer or disclose your personal information to any entity which takes over or acquires the editorial business. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, of which we will duly notify you, then the new owners may use your personal data in the same way as set out in this Policy. We also share aggregated, non-identifiable information with third parties. Before sharing this information, we ensure that it cannot identify you as an individual. For example, we regularly release information about the size and growth of our audiences. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

To prevent unauthorized access to your information, stears.co uses Transport Layer Security (SSL/TLS) to ensure secure transmission of your personal data. You should see the padlock symbol in your URL address bar once you are successfully logged into the platform. The URL address will also start with https:// depicting a secure Webpage.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Please note that you also have a significant role in protecting your information. No one can see or edit your personal information without knowing your username and password, so do not share these with others. However, as the internet is not a secure medium, we cannot guarantee that security breaches will never occur. Accordingly, we are not responsible for the matters, which include actions of hackers and other unauthorized third parties that breach our reasonable security procedure.

7. DATA RETENTION

We will only retain your personal data for as long as 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.

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.

In some circumstances, we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

You have a right to:

- request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and check that we are lawfully processing it. Please note that a data subject access request will attract a fee;

- request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may ask you to verify the accuracy of the new data you provide to us;
- request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. If we were not able to comply with your request of erasure for specific legal reasons, you will be notified, if applicable, at the time of your request;
- object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms;
- object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- request the transfer of your personal data to you or to a third party. We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Please note that this request may also attract a fee;
- withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

● **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

● **Time limit to respond**

We try to respond to all legitimate requests within 60 days. Occasionally it could take us longer than 60 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. TRANSFER OF PERSONAL DATA

● Third Party Processor

We may engage the services of third parties in order to process your personal data. The processing by such third parties shall be governed by a written contract with these third parties to ensure that adequate protection and security measures are put in place by the third party for the protection of your personal data in accordance with the terms of this Policy and applicable data protection laws.

● International Transfers

Your information may be transferred to a foreign country or international organisation for the purpose of providing our service to you. We will ensure that there are adequate data protection laws in the recipient country or organisation before transferring your information. The country shall be among the NITDA (National Information Technology Development Agency) White List of countries with adequate data protection laws or any other relevant authorities that exist and may come into existence in the jurisdictions where the company has offices.

We will also only transfer your personal information where:

- a. Your explicit consent has been obtained;
- b. The transfer is necessary for the performance of a contract between you and Stears;
- c. The transfer is necessary to conclude a contract between Stears and a third party in your interest;
- d. The transfer is necessary for reason of public interest;
- e. The transfer is for the establishment, exercise or defense of legal claims;
- f. The transfer is necessary in order to protect your vital interests or the interests of other persons, where you are physically or legally incapable of giving consent.

Provided, in all circumstances, that you have been manifestly made to understand the specific principle(s) of data protection that are likely to be relied on in the event of transfer to a third country, this provision shall not apply to any instance where you are answerable in a duly established legal action for any civil or criminal claim in another country.

We will take all necessary steps to ensure that your personal data is transmitted in a safe and secure manner. Details of the protection given to your information when it is transferred to a foreign country shall be provided to you upon request.

10. DISCLAIMER

By this Policy, we do not represent or warrant the condition or functionality of stears.co, its suitability for use, nor guarantee that stears.co will be free from interruption or any error. No liability or responsibility shall lie for risks associated with the use of stears.co, including but not limited to any risk to your computer, software or data being damaged by any virus, software, or any other file that might be transmitted or activated via stears.co or your access to it. Neither do we guarantee the reliability of information contained on stears.co —particularly those shared by third party users.

11. TRAINING

We shall ensure that employees who collect, access and process your personal data receive adequate data privacy and protection training in order to develop the necessary knowledge, skills and competence required to effectively manage the compliance framework under this Policy and applicable data protection laws, with regard to the protection of personal data. On an annual basis, we shall develop a capacity building plan for our employees on data privacy and protection in accordance with applicable data protection laws.

12. LIMITATION OF LIABILITY

We exercise reasonable efforts to safeguard the security and confidentiality of your personal data; however, we will not be liable for unauthorised disclosure of personal data that occurs through no fault of ours.