

Privacy Policy



Edited

BY



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PREAMBLE:

Landover Company Ltd (“Landover” “Company,” “we,” “us,” or “our”) respects your privacy and is committed to safeguarding the personal data we have, control and/or process concerning you in compliance with applicable data protection laws.

1. Introduction

This Privacy Notice describes your privacy rights regarding Landover Company Limited’s (“Landover”, “we”, “us” or “our”) collection, use, storage, sharing and protection of your personal identifiers, electronic network activity information, professional information, location information and other types of information. It applies to our platform, website and all related sites, applications, services, and tools (“Services”) regardless of how you access or use them.

This Privacy Notice applies to all forms of systems, operations and processes within our environment that involve the collection, storage, use, transmission, and disposal of Personal Information (described below). It is provided to help you understand what information we collect from you, how the information collected is used, how we protect it, and your rights to it, amongst others.

This Privacy Notice is strictly restricted to only our Services and therefore does not apply to services that are not owned or controlled by us, including third-party platforms/websites. We are committed to handling all personal data provided to us in compliance with both applicable and model data privacy and protection laws.

2. Who are we?

We are Landover Company Limited, with our address at No. 17 Simbiat Abiola Road, Ikeja, Lagos State, Nigeria. You may contact us by post at the above address, by email at admin@landover.aero or by telephone on +2348035351190. Landover Company Limited is the Data Controller responsible for your personal data and determines the purposes for and the manner in which your personal data is processed or is to be processed.

Our data protection officer is the Head, Information Technology of Landover Company Ltd., and any enquiries about our use of your personal data should be addressed to the

Data Protection Officer by email at admin@landover.aero or by telephone on +2348035351190.

3. The Information We Collect

Personal Information.

As part of our operations, we collect and process certain types of information (such as name, telephone numbers, address etc.) of individuals that makes them easily identifiable. These individuals include current, past, and prospective employees, suppliers/vendors, customers or former customers, and other individuals whom we communicate or deal with, jointly and/or severally ("Data Subject(s)").

To use our Services, you will voluntarily provide us with certain Personal Information. Personal Information refers to information relating to an identified person or information that can be used to identify you. We will not share or disclose your Personal Information with a third party without your consent except as may be required for the purpose of providing you with our Services or under applicable legislations.

The following are the information that we collect and process:

- i. Individual personal information (e.g., names, date, gender, marital status, place of birth, nationality etc.);
- ii. Individual personal contact details (e.g., address, email address, mobile numbers);
- iii. Identity information (e.g., photo ID, nationality, utility bill, national ID card and/or number);
- iv. Information about the ways you interact with Landover (e.g., channels used, geographic information, software used and information concerning your complaints);
- v. Information captured in customer documentation or data exchange such as application forms or advice documents or via telephone (e.g., records of advice);
- vi. Marketing and promotional information (e.g., details of the services we offer and your preferences);
- vii. Cookies and similar technologies used to remember your preferences and tailor content;

- viii. Data or records of correspondence related to relevant exchanges of information (e.g., emails);
- ix. Information to fulfill regulatory obligations (e.g., transaction details, user activity);
- x. Information from other entities (e.g., relevant transaction information);
- xi. Information from third parties providing information to identify and manage fraud;
- xii. Closed circuit television (CCTV) in and around Landover's facilities (these may collect photos or videos of you); and
- xiii. Other information about you that is voluntarily provided by filling online forms or by communicating with us, whether face-to-face or via other available channels (e.g., by phone, email, or on our website).

In providing you with our Products or Services, we may rely on third-party servers located in foreign jurisdictions from time to time, which as a result, may require the transfer or maintenance of your personally identifiable information on computers or servers in foreign jurisdictions. We will endeavour to ensure that such foreign jurisdictions have data protection legislation that is no less than the existing data protection regulations in force in Nigeria and your personally identifiable information is treated in a safe and secure manner.

4. What Constitutes Consent?

By clicking "I agree" or continuing to use this website, you consent to Landover Company's Terms and Conditions as well as any data which we collect as stated above.

You agree that upon granting us your consent, you have the legal capacity to give consent and you are aware of your privacy rights and your option to withdraw your consent at any given time.

We use your Personal Information to:

- a. contact you and to provide you with the required Services;
- b. respond to your questions or requests;
- c. improve features, platform and website content and analyse data to develop and enhance services;
- d. address inappropriate use of our Services;

- e. process your payment and fulfill our contract with you;
- f. prevent, detect and manage risk against fraud and illegal activities using internal and third-party screening tools;
- g. send you marketing content, newsletters and service updates curated by us, however, we will provide you with an option to unsubscribe if you do not want to hear from us;
- h. verify your identity and the information you provide in line with our statutory obligations using internal and third-party tools;
- i. maintain up-to-date records;
- j. resolve disputes that may arise, including investigations by law enforcement or regulatory bodies; and
- k. any other purpose that we disclose to you in the course of providing our Services to you.

Our website access logs are only collected for tracking visits to our site for statistical and performance optimization purposes and to assist should any visitor, including you, not be able to access websites.

5. Information that we collect from Platform Visitors

We do not collect any unauthorised Personal Information when you visit our website and platform except for the purpose for which you have consented that we do so. For the avoidance of doubt, any Personal Information collected for the purpose of carrying out the Services or providing you with the required Products will be done further to your explicit consent and shall be used only for the purpose communicated.

We may collect non-personally identifiable information to monitor and improve our platform and Services. We will not share or disclose this information with third parties except as a necessary part of providing our Products or Services to you. We may, where applicable, use the information to target advertisements to you.

6. How we use the information we collect

We will only use the information we collect as permitted by the law. We have set out below a description of how we use your information:

- i. to represent your interests and provide you with legal and related services;

- ii. to respond to your comments, questions, inquiries, and customer service requests;
- iii. to improve our services, platforms, and website content;
- iv. to address inappropriate use of our Services;
- v. to send newsletters, technical notices, updates, security alerts, information about events and conferences, and administrative messages to you;
- vi. to verify your identity and the identities of members of your company;
- vii. to verify the information, you provide;
- viii. to maintain up-to-date records;
- ix. for recruitment purposes;
- x. to comply with regulatory and legal obligations;
- xi. to help personalise service experience for you;
- xii. to communicate with you;
- xiii. to protect the rights, privacy, safety, or property of the Firm;
- xiv. to enforce our terms, conditions, and policies;
- xv. to detect and prevent fraud, malicious and other illegal activities;
- xvi. to resolve disputes that may arise, including investigations by law enforcement or regulatory bodies; and
- xvii. for any other purpose that we disclose to you in the course of providing our services to you.

7. How We Share Your Personal Data

We do not sell, trade, or rent personal data to anyone. However, to enable us to render our services to you, we may indirectly share your information with trusted third parties, such as software providers, as well as any third party that you have directly authorized to receive your personal data. Your personal data may be stored in locations outside our direct control, for instance, on servers or databases co-located with host providers.

We may disclose your personal data in compliance with applicable laws or legal obligations to which we are bound. Please note that third-parties' websites you engage with through our services or website(s) will have their privacy policies, and we are therefore not responsible for their actions, including their information protection practices.

The use of your data by such third parties will be subject to their applicable privacy policies, which you should carefully review.

8. Purpose Limitation

We collect Personal Information only for identified purposes and for which consent has been obtained. Such Personal Information cannot be reused for another purpose that is incompatible with the original purpose, except consent is obtained for such purpose.

9. Cookies and Access information

Cookies are small pieces of data which are stored by a website through your browser, to enable an improved experience whilst using or browsing a particular website/app or to remember your preferences or navigation history/activity (such as pages you have visited within a particular site or typical activity) at a particular site.

You can delete cookies using your browsers own Clear History function. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website and app features or services may not function properly without cookies.

Most web browsers allow some control of cookies through the browser settings. It is important to note however, that if you block cookies from Our site or apps, there are a number of functions that may not work, and you will need to reset your preferences each time you log in.

When you visit our Company website, we collect your IP address, page visited, date and time within the webserver access logs. We collect this information without making a direct reference to the visitor unless this is included within the URL of page requested.

We may use cookies to remember your preferences when you have visited our site and pages you like to regularly visit and to ensure that you receive the most up to date information which is relevant to you and your experience with Us. We also use cookies for internal management purposes and to enable essential activity to ensure that your account works correctly when accessing our services. We will not use these cookies to store information such as account details or transaction history.

10. Data Retention

We will retain your Personal Information for as long as is needed to provide our Services to you, comply with our legal and statutory obligations or verify your information with the

required verification authorities. We may keep your contact information for up to **6 years** after providing the information on our site due to company record keeping obligations. Your personal information will then be removed.

We are statutorily obligated to retain the Personal Information and data you provide to us in order to process transactions, ensure settlements, make refunds, identify fraud, holistically carry out our Services and in compliance with laws and regulatory guidelines applicable to us and our service partners. Therefore, even after discontinuance of our Services, we will retain certain Personal Information and transaction data to comply with these obligations.

All Personal Information shall be destroyed by us where possible. For all Personal Information and records obtained, used, and stored by us, we shall perform periodical reviews of the data retained to confirm the accuracy, purpose, validity, and requirement to retain.

The length of storage of your Personal Information shall, amongst other things, be determined by:

- a. the contract terms agreed between us and the Data Subject or as long as it is needed for the purpose for which it was obtained; or
- b. whether the transaction or relationship has statutory implication or a required retention period; or
- c. whether there is an express request for deletion of the Personal Information by the Data Subject, provided that such request will only be treated where the Data Subject is not under any investigation which may require us to retain such Personal Information or there is no subsisting contractual arrangement with the Data Subject that would require the processing of the Personal Information; or
- d. whether we have another lawful basis for retaining that information beyond the period for which it is necessary to serve the original purpose.

11. Your rights over your information

Once your Personal Information is held by us, you are entitled to reach out to us to exercise the following rights:

- a. **Request access to your personal data (commonly known as a “data subject access request”):** This enables you to receive a copy of the personal data we

hold about you and to check that we are lawfully processing it. You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may notify you of our refusal to comply with your request in these circumstances. Where we have reasonable doubts concerning the identity of the natural person making the request for information, we may request the provision of additional information necessary to confirm the identity of the Data Subject. Where data is held electronically in a structured form, such as in a Database, as the Data Subject, you have a right to receive that data in a common electronic format.

- b. Right to 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 need to verify the accuracy of the new data you provide to us.
- c. Right to 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. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- d. Right to object to the processing of your personal data:** Where we are relying on a legitimate interest (or those of a third party) there may be something about your situation which could justify an objection to processing on this ground as you may feel it impacts on your fundamental rights and freedoms. You also have the right to 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.
- e. Right to request restriction of processing of your personal data:** This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- a) If you want us to establish the data's accuracy;
 - b) Where our use of the data is unlawful, but you do not want us to erase it;
 - c) Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - d) You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- f. Request the transfer of your personal data to you or to a third party:** We will provide to 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.
- g. 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.

Your request will be reviewed by us and carried out except as restricted by law or our statutory obligations. You may decline to provide your Personal Information when it is requested by us, however, certain Services or all the Services may be unavailable to you. You may review and update your Personal Information directly or by contacting us by email at admin@landover.aero.

12. Principles of Data Processing

Landover Company Ltd would ensure that it abides by the following principles when Processing Data:

- We would only collect and process your data in accordance with specific, legitimate and lawful purposes consented to by you, the Data Subject; provided that: further processing may be done only for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes;
- We would ensure that the data it collects is adequate, accurate and without prejudice to the dignity of human person;

- The data collected is stored only for the period within which it is reasonably needed and
- The data collected would be secured against all foreseeable hazards and breaches such as theft, cyberattack, viral attack, dissemination or manipulations of any kind, damage by rain, fire or exposure to other natural elements.

Landover Company also recognizes the following principles:

- Anyone who is entrusted with the personal data of a data subject or who is in possession of the personal data of a data subject owes a duty of care to the said data subject
- Anyone who is entrusted with the personal data of a data subject or who is in possession of the personal data of a data subject shall be accountable for his acts and omissions in respect of data processing and in accordance with the principles contained in the Nigerian Data Protection Act (NDPA) 2023 and the General Data Protection Regulations (GDPR).

13. **Our Lawful Basis for Processing Personal Information**

We will only use and process your personal data as permitted by the Nigerian Data Protection Act 2023 (**NDPA**). We have set out below a description of all the legal basis we may rely on to process your personal data:

- a. where you have given us consent to the processing of your personal data for one or more specific purposes;
- b. where processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract;
- c. where processing is necessary for compliance with a legal obligation to which we are subject;
- d. where processing is necessary to protect your vital interests or the vital interests of another natural person, and
- e. where processing is necessary for the performance of a task carried out in the public interest or in exercise of an official public mandate vested in us.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data. Please contact us by

sending an email to: admin@landover.aero, if you need details about the specific legal ground we are relying on to process your personal data where more than one ground may have been used to process your personal data.

For the purpose of this Privacy Policy, consent means any freely given, specific, informed, and unambiguous indication of the Data Subject's wishes by which they, through a statement or a clear affirmative action, signify their agreement to the processing of Personal Information relating to them.

14. Data Minimization

We limit Personal Information collection and usage to data that is relevant, adequate, and necessary for carrying out the purpose for which the data is processed. We will evaluate whether and to what extent the processing of Personal Information is necessary and where the purpose allows, anonymized data will be used.

15. Age Restriction

Our Services are not directed to children under 18. In processing personal data of children below the aforementioned age bracket, we apply appropriate mechanisms to verify their age and consent, by consistently requiring the presentation of government-approved identification documents as mandated by law. If you access our Services or Platform and you are below 18 years, you represent and warrant that you have obtained consent from your parent(s) or legal guardian(s). If you have inadvertently provided personal data of a child to us, please notify us at sysadm@landover.aero and we will delete such personal data. If as a parent or guardian, you become aware that your child or ward has provided us with any information without your consent, please contact us through the details provided in this Privacy Policy.

16. Access to Third Parties

16.1 Third Party Processor within Nigeria

We may engage the services of third parties to process the Personal Information of Data Subjects we collect. The processing by such third parties shall be governed by a written contract with us to ensure adequate protection and security measures are put in place by the third party for the protection of Personal Information in accordance with the terms of this Privacy Policy.

We may share your information with law enforcement agencies, public or tax authorities or other organizations if legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:

- a. comply with a legal obligation, process, or request (including tax and related reporting requirements);
- b. enforce our Terms of Service and other agreements, policies, and standards, including investigation of any potential violation thereof;
- c. detect, prevent, or otherwise address security, fraud, or technical issues; or
- d. protect the rights, property, or safety of us, our users, a third party, or the public as required or permitted by law (including exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction).

17. Transfer of Personal Information to Foreign Country

Where Personal Information is to be transferred to or accessed by a country outside Nigeria, we shall put adequate measures in place to ensure the security of such Personal Information. In particular, we shall, among other things, confirm whether the country is on the National Information Technology Development Agency ("NITDA") Whitelist of Countries with adequate data protection laws.

Transfer of Personal Information out of Nigeria would be in accordance with the provisions of the Nigeria Data Protection Act ("NDPA"). We will therefore only transfer Personal Information out of Nigeria on one of the following conditions:

- a. the consent of the Data Subject has been obtained;
- b. the transfer is necessary for the performance of a contract between us and the Data Subject or implementation of pre-contractual measures taken at the Data Subject's request;
- c. the transfer is necessary to conclude a contract between us and a third party in the interest of the Data Subject;
- 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 the vital interests of the Data Subjects or other persons, where the Data Subject is physically or legally incapable of giving consent.

We will take all necessary steps to ensure that your Personal Information is transmitted in a safe and secure manner. Details of the protection given when your Personal Information is transferred outside Nigeria shall be provided to you upon request.

18. How we protect your information

We shall establish adequate controls to protect the integrity and confidentiality of your Personal Information, both in digital and physical format and to prevent your Personal Information from being accidentally or deliberately compromised.

We are committed to managing your Personal Information in line with global industry best practices. We protect your Personal Information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. We also use industry-recommended security protocols to safeguard your Personal Information. Other security safeguards include but are not limited to data encryption, firewalls, and physical access controls to our building and files, and granting access to your Personal Information to only employees who require it to fulfil their job responsibilities. No Personal Information processing will be undertaken by an employee who has not been authorized to carry such out as part of their legitimate duties.

Employees may have access to your Personal Information only as is appropriate for the type and scope of the task in question and are forbidden to use your Personal Information for their own private or commercial purposes or to disclose them to unauthorized persons, or to make them available in any other way.

19. Compliance With Regulatory Best Practices

Please note that the collection, processing, security, storage, and erasure of your personal data including any updates to this privacy policy will be in accordance with existing or new privacy and data protection provisions and laws in Nigeria which includes but not limited to the following:

- a. Constitution of the Federal Republic of Nigeria 1999 (as Amended);
- b. Nigeria Data Protection Act 2023 ("NDPA");
- c. Nigeria Data Protection Regulation 2019 ("NDPR");

- d. Nigeria Cybercrimes (Prohibition and Prevention, Etc.) Amendment Act, 2024;
- e. Nigeria Federal Competition and Consumer Protection Act, 2018 (FCCPA);
- f. Nigeria Freedom of Information Act 2011;
- g. Nigeria Bar Association Cybersecurity Guideline, 2024.
- h. Nigerian Data Protection Act (NDP Act), General Application and Implementation Directive (GAID) 2025.

20. Updates, Modifications and Amendments

We reserve the right to update, modify, change, or revise this Privacy Policy from time to time. The changes will not be retroactive, and the most current version of this Privacy Policy will always be on this page and will continue to govern our relationship with you. We advise that you check this page often, referring to the date of the last modification on the page.

By continuing to use our services after the changes become effective, you agree to be bound by the revised Privacy Policy.

It is vital 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.

21. Supervision and Compliance

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy policy and ensuring our compliance with the applicable data protection laws and regulations.

22. Complaints and Remedies

You may file a complaint in accordance with this privacy policy if you believe that any provision of this privacy policy or your privacy rights have been violated in respect of your personal information or if your access to our Services have been compromised, to enable us to take the necessary steps towards ensuring the security of your Personal Information. All complaint must be addressed to the company by sending an email to our Data Protection Officer using the following contact details: sysadm@landover.aero.

Please note that, the complaint and resolution procedure is not prejudicial to your right to complain to data protection authorities (in this case, the Nigeria Data Protection Commission) using the following contact details;

Address: No. 12 Clement Isong Street, Asokoro, Abuja, Nigeria.

Email Address: info@ndpc.gov.ng

We will notify you of any breach and also notify Nigeria Data Protection Commission (NDPC) within 72 hours of becoming aware of such breach.

We would, however, appreciate the chance to deal with your concerns before you approach the data protection authorities. Kindly contact us in the first instance by sending an email to: sysadm@landover.aero.

Questions and Inquiries

You may also contact us if you have any questions relating to this Privacy Policy or would like to find out more about exercising your data protection rights. All questions, comments and requests regarding this policy should be addressed to sysadm@landover.aero; mcld@landover.aero.

If you are in Lagos, we can also be reached at: No. 17, Simbiat Abiola Road, Ikeja, Lagos State, Nigeria.

GLOSSARY

TERM	DEFINITION
Data Subject	Any person that can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural, or social identity.
Consent	Any freely given, specific, informed, and unambiguous indication of the Data Subject's wishes by which he or she, through a statement or a clear affirmative action, signifies agreement to the processing of Personal data relating to him or her.
Personal Data/Personal Information	Any information relating to an identified or identifiable natural person ('Data Subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location

	data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; It can be anything from a name, address, a photo, an email address, bank details, posts on social networking websites, medical information, and other unique identifier such as but not limited to MAC address, IP address, IMEI number, IMSI number, SIM, Personal Identifiable Information (PII) and others.
Processing	Any operation or set of operations which is performed on Personal data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
Third Party	Any natural or legal person, public authority, establishment, or any other body other than the Data Subject, the Data Controller, the Data Administrator, and the persons who are engaged by the Data Controller or the Data Administrator to process Personal Data.
Personal data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal data transmitted, stored, or otherwise processed.
Foreign Country	Other sovereign states, autonomous or semi-autonomous territories within the international community.
Data Subject Access Request	The mechanism for an individual to request a copy of their data under a formal process which may include payment of a fee.
Data Minimisation	Personal data adequate, relevant, and limited to the minimum necessary for the purposes for which it was collected or further processed.

Data Retention	Retaining personal data for the identification of data subjects, having regard to the purposes for which it is collected or further processed.
Applicable laws.	Any law enacted by the National Assembly or House of Assembly of any State in Nigeria, or subsidiary legislation made pursuant to such statutes.
Data Controller	A data controller means an individual, private entity, public Commission, agency or any other body who, alone or jointly with others, determines the purposes and means of processing of personal data.
Data Protection Officer	A data protection controller may either be an employee of a data controller or engaged by a service contract, with expert knowledge of data protection law and practices to advise the data controller or data processor, and their employees, who carry out processing made under the Act, or monitor compliance and related policies of the data controller or data processor and act as the contact point for the Commission on issues relating to data processing.