

SPNOVATE LIMITED

PRIVACY POLICY

Applicable to users in Nigeria and the United Kingdom

Last updated: [30/06/2026] | Effective date: [30/06/2026]

1. Introduction and Scope

SPnovate Limited (“the Company,” “we,” “us” or “our”) provides this Privacy Policy (this “Policy”) to explain how we collect, use, share, store and protect personal data when you use our website and mobile application (together, the “Platform”).

This Policy applies to all visitors, registered users, students, teachers, creatives, affiliates and job applicants who interact with the Platform, regardless of the device used to access it.

We are incorporated in Nigeria and the United Kingdom and offer our services to, and process the personal data of, individuals located in Nigeria and the United Kingdom. We do not currently offer services to, or knowingly process the personal data of, individuals in the European Union or elsewhere; if that changes, we will update this Policy and our applicable legal bases accordingly.

2. Applicable Law and Our Representatives

Depending on where you are located, your personal data is processed in accordance with:

- the Nigeria Data Protection Act 2023 (“NDPA”) and its subsidiary regulations, if you are located in Nigeria; and
- the UK General Data Protection Regulation (“UK GDPR”) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025, if you are located in the United Kingdom,

together with any other data protection or privacy law that applies to you because of where you live or how you use the Platform.

Our representatives

Because we are not established in Nigeria or the United Kingdom, we have appointed the following representatives, who you and the relevant supervisory authority may contact on data protection matters in addition to our Data Protection Officer:

	Nigeria representative	UK representative
Name	Olaide Odukoya	[Joel Daniel]
Address	[Ogudu GRA, Lagos, Nigeria]	[Embleton Meadow Houghton Regis, Bedfordshire]
Email	[olaide.odukoya@gmail.com]	Joel@spnovate.com]

3. Age Requirements and Children's Data

The Platform is intended for use by individuals aged 18 or over, and by individuals aged 13 to 17 who have the consent of a parent or legal guardian. The Platform is not intended for, and we do not knowingly collect personal data from, children under the age of 13.

By registering for or using the Platform, you confirm that you are either:

- 18 years of age or older; or
- between 13 and 17 years of age, and your parent or legal guardian has reviewed and agreed to this Policy and our Terms and Conditions on your behalf.

If we become aware that we have collected personal data from a child under 13 without the consent required by law, we will take reasonable steps to delete that data as soon as practicable. A parent or guardian who believes their child under 13 has provided us with personal data may contact our Data Protection Officer using the details in Section 14 to request deletion.

4. Personal Data We Collect

The personal data we collect depends on whether you use the Platform as a student, teacher, creative, affiliate, job applicant, or simply as a visitor.

4.1 Students

Identification data (name, IP address, device ID, user ID), contact details (email and postal address), date of birth, nationality, geolocation data, navigation data, personal interests, academic data, your history of activity on the Platform, your image, and payment data (bank account or card details and payment behaviour).

4.2 Teachers, creatives and affiliates

Identification data (name, national identity document, image, voice recordings, social media username), contact details (email, postal address, telephone number), date of birth, nationality, academic and professional data (occupation, professional experience, CV), tax identification data, and any other information you choose to provide.

4.3 Job applicants

Name, email address, telephone number, CV, employment history, and social media profile, where submitted through our job listings or via LinkedIn.

4.4 Information you provide voluntarily

This includes information you submit through customer service emails, newsletter sign-ups, account registration, polls, surveys, contests, and our chat functions. Where a field is optional, we will mark it accordingly; you may decline to complete optional fields.

4.5 Information collected automatically

As you use the Platform, we automatically collect: your IP address; standard browser/device information (browser type and language, device identifiers, operating system); pages viewed and links clicked; and search terms entered into the Platform's search function. We use this information to operate, secure and improve the Platform, and to compile aggregated, non-identifying usage statistics. Full details of the cookies and similar technologies we use are set out in our separate Cookie Policy.

4.6 Aggregated and anonymised data

We compile aggregated demographic and usage statistics that do not identify any individual. We may share this aggregated data with third parties, including for analytics or advertising purposes, because it does not constitute personal data once properly anonymised.

4.7 Information from other sources

We may combine the information you give us with information from other sources, such as publicly available data, marketing partners, or postal address verification services, in accordance with this Policy.

5. How and Why We Use Your Personal Data

Under both the NDPA and UK GDPR, we may only process your personal data where we have a valid legal basis to do so. The table below summarises our main processing purposes and the legal basis we rely on under each framework.

Purpose	What we use	Legal basis (UK GDPR)	Legal basis (NDPA)
Creating and managing your account/registration	Identification & contact data	Performance of a contract	Performance of a contract
Processing payments and subscriptions	Payment & identification data	Performance of a contract	Performance of a contract
Issuing completion certificates	Academic data, identification data	Performance of a contract	Performance of a contract
Responding to enquiries, complaints, support requests	Contact data, content of enquiry	Legitimate interests	Legitimate interests
Platform security and fraud/abuse prevention	IP address, device ID, navigation data	Legitimate interests	Legitimate interests
Quality, satisfaction surveys and service improvement	Survey responses, usage data	Legitimate interests / Consent	Legitimate interests / Consent
Anonymous/aggregated statistical reporting	Aggregated usage data	N/A (anonymised)	N/A (anonymised)
Direct marketing, newsletters, promotional offers	Contact data, preferences	Consent	Consent
SMS / text message alerts	Mobile number, consent record	Consent (and PECR rules)	Consent (and NCC rules)
Recruiting teachers, creatives and affiliates	Professional/academic data, CV, tax ID	Performance of a contract / Legitimate interests	Performance of a contract / Legitimate interests
Processing job applications	CV, employment history, contact data	Steps prior to entering a contract	Steps prior to entering a contract
Complying with legal obligations, court orders, regulator requests	As relevant to the request	Legal obligation	Legal obligation

Establishing, exercising or defending legal claims	As relevant to the claim	Legitimate interests	Legitimate interests
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Where we rely on legitimate interests, we have considered that interest against your rights and freedoms and concluded that our processing is fair, proportionate and within your reasonable expectations. You can ask us for more detail about a specific legitimate interest assessment by contacting our Data Protection Officer.

Where we rely on your consent (for example, for marketing communications or optional surveys), you may withdraw that consent at any time, as described in Section 13.

6. Marketing Communications and Text Messages

Where you opt in to receive text message alerts, by submitting your mobile number and confirming consent on the Platform, we will send you messages such as event alerts, updates, discounts and offers, at a frequency consistent with what we disclose to you at sign-up. We will never sell or share your mobile number except as described in this Policy.

In the United Kingdom, marketing calls, texts and emails are also subject to the Privacy and Electronic Communications Regulations (PECR), which generally require your prior consent for electronic marketing unless a narrow “soft opt-in” exception applies. In Nigeria, SMS and telemarketing communications are subject to applicable Nigerian Communications Commission (NCC) consumer protection rules.

You can opt out of marketing messages at any time, free of charge, by:

- clicking “unsubscribe” in any marketing email;
- replying “STOP” to any text message, or emailing support@spnovate.com with “STOP”; or
- contacting our Data Protection Officer using the details in Section 14.

Opting out of marketing will not affect service-related communications we are required to send you (for example, confirming a transaction or responding to a support request).

7. How We Share Your Personal Data

7.1 Service providers

We share personal data with third-party service providers who perform functions on our behalf, such as payment processing, hosting, analytics, and customer support. We enter into a data processing agreement with each such provider and take reasonable steps to satisfy ourselves that they maintain appropriate technical and organisational measures to protect your data. They may only use your data to provide the contracted service, and must dispose of it in line with our instructions once it is no longer needed.

7.2 Legal and regulatory disclosures

We may disclose personal data where required to comply with a valid legal process (such as a court order or regulatory request), to protect our rights, property or safety, or the rights, property or safety of our users or others, or where otherwise required or permitted by applicable law.

7.3 Business transfers

If we sell, merge, or transfer all or part of our business or assets, personal data may be transferred as part of that transaction. Any acquirer will be required to handle your personal data in accordance with this Policy, or to notify you of any material change in how your data will be used.

7.4 Sensitive personal data

Where we wish to share sensitive personal data (such as data concerning health, religion or biometric data) with a third party for a purpose not covered above, we will obtain your specific consent first, unless we are legally required or permitted to proceed without it.

7.5 Third-party links and social media

The Platform may link to third-party websites or social media pages. We are not responsible for the privacy practices of those third parties, and this Policy does not apply to information you submit to them. Please review their privacy policies before providing personal data.

We do not, and will not, sell your personal data to third parties for their own direct marketing purposes.

8. International Data Transfers

Because we operate across borders, your personal data may be transferred to, and processed in, a country other than the one in which you live, including countries that may not have data protection laws equivalent to those in your home jurisdiction. Where this happens, we put in place appropriate safeguards, which may include:

- relying on an adequacy decision or regulation made by the NDPC or the UK Government (as applicable), confirming that the destination country provides an adequate level of protection;
- entering into the UK's International Data Transfer Agreement (IDTA), or the EU Standard Contractual Clauses together with the UK Addendum, for transfers out of the UK;
- using contractual clauses or other safeguards approved or recognised by the NDPC for transfers out of Nigeria; or
- relying on binding corporate rules, approved codes of conduct, or certification mechanisms, where applicable.

You may request further information about the safeguards we use for a specific transfer by contacting our Data Protection Officer.

9. Data Retention

We retain personal data only for as long as reasonably necessary to fulfil the purpose for which it was collected, including to satisfy any legal, accounting, or reporting requirements. As a general guide:

Account and profile data: for the duration of your account, plus 6 years after closure, to deal with any claims arising from your use of the Platform.

Payment and transaction records: 6 years from the date of the transaction, to meet tax, accounting and audit obligations.

Marketing data (e.g. newsletter sign-ups): until you withdraw consent or opt out, plus a reasonable period (up to 30 days) to give effect to your request.

Job applications: 12 months from the date of application, unless you are hired or you ask us to delete it sooner.

Support tickets and similar operational records: 3 years from the date of last activity.

At the end of the applicable retention period, we will securely delete or anonymise your personal data, except where we are required to retain it for longer by law.

10. How We Protect Your Data

We maintain technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access, including access controls, encryption of data in transit and at rest where appropriate, and staff training. No method of transmission or storage is completely secure, and we cannot guarantee absolute security; you should also take care to protect your own account credentials.

If we become aware of a personal data breach that is likely to result in a risk to your rights and freedoms, we will notify the NDPC and/or the ICO, as applicable, and affected individuals, within the timeframes required by law.

11. Your Rights

Subject to certain conditions and exemptions under the NDPA and/or UK GDPR, you have the right to:

- be informed about how your personal data is collected and used (as set out in this Policy);
- request a copy of the personal data we hold about you (a “subject access request”);
- have inaccurate or incomplete personal data corrected;
- request erasure of your personal data in certain circumstances;
- restrict our processing of your personal data in certain circumstances;
- receive a copy of personal data you have provided to us, in a structured, commonly used, machine-readable format, and have it transmitted to another organisation (“data portability”);
- object to processing carried out on the basis of legitimate interests, and to object to direct marketing at any time;
- not be subject to a decision based solely on automated processing, including profiling, that produces legal or similarly significant effects, except in limited circumstances; and
- withdraw consent at any time, where processing is based on consent, without affecting the lawfulness of processing carried out before withdrawal.

If you wish to exercise any of these rights, please contact our Data Protection Officer using the details in Section 14. We will respond within the timeframe required by applicable law (generally one month, extendable in certain circumstances under UK GDPR; and within the period prescribed by the NDPA and its implementing regulations). If we decline a request, we will explain why and tell you how to escalate the matter.

Where a third party is involved in processing your personal data, we will, where appropriate, pass on your request to that party or coordinate a response with them.

12. Automated Decision-Making

We do not currently use your personal data to make decisions based solely on automated processing that produce legal or similarly significant effects on you. If this changes, we will update this Policy and provide you with information about the logic involved, and the significance and likely consequences of such processing, as required by law.

13. How to Exercise Your Rights or Withdraw Consent

You may withdraw consent, exercise any of your rights, or ask a question about how we handle your personal data, by contacting our Data Protection Officer (see Section 14). To help us verify your identity and locate your data, please provide your full name, the email address associated with your account, and a description of your request.

This Policy's opt-out and unsubscribe mechanisms apply only to communications sent by us or on our behalf. If you have separately provided your information to a third party (for example, after clicking through to an advertiser's website), you will need to opt out directly with that third party; we have no control over, and no liability for, their use of your information.

14. Our Data Protection Officer and How to Complain

Our Data Protection Officer can be contacted as follows:

- Name: [Joel Daniel]
- Email: [joel@spnovate.com]
- Postal address: [Embleton Meadow Houghton Regis]

If you are not satisfied with how we have handled your personal data or your request, you have the right to lodge a complaint with the relevant supervisory authority:

	Nigeria	United Kingdom
Supervisory authority	Nigeria Data Protection Commission (NDPC)	Information Commissioner's Office (ICO)
Address	No. 12 Clement Isong Street, Asokoro, Abuja, Nigeria	Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom
Email	info@ndpc.gov.ng	casework@ico.org.uk
Phone / Web	09160615551 / ndpc.gov.ng	0303 123 1113 / ico.org.uk

15. Opting Out and Closing Your Account

You may opt out of receiving marketing communications at any time using the methods described in Section 6. You may also remove your information from our marketing database by emailing support@spnovate.com. For information on how to close your account entirely, please see our Terms and Conditions.

16. Changes to This Policy

We may update this Policy from time to time to reflect changes in our practices or in applicable law. Where we make a material change, we will notify you through the Platform (and, where appropriate, by email) before the change takes effect. Your continued use of the Platform after a change takes effect constitutes your acknowledgement of the updated Policy. We encourage you to review this Policy periodically.

17. Relationship to Our Terms and Conditions

This Policy is incorporated into, and should be read together with, our Terms and Conditions. In the event of a conflict between this Policy and the Terms and Conditions on a matter other than the processing of personal data, the Terms and Conditions will prevail; on matters concerning the processing of personal data, this Policy will prevail.

18. Contact Us

For any other questions about this Policy or our data practices, please contact us at support@spnovate.com.