

INTRODUCTION

This privacy policy is provided in a layered format and explains the specific areas set out below.

**IMPORTANT INFORMATION AND WHO WE ARE
THE DATA WE COLLECT ABOUT YOU
HOW IS YOUR PERSONAL DATA COLLECTED?
HOW WE USE YOUR PERSONAL DATA
DISCLOSURES OF YOUR PERSONAL DATA
INTERNATIONAL TRANSFERS
DATA SECURITY
DATA RETENTION
YOUR LEGAL RIGHTS
GLOSSARY**

IMPORTANT INFORMATION AND WHO WE ARE

Aleph Digital Advertising and Marketing Nigeria Ltd.
48 Awolowo Road
Ikoyi, Lagos State
Nigeria

This privacy policy aims to give you information on how Ad Dynamo collects and processes your personal data through your use of this website, including any data you may provide through this website when you insert your contact details to our Contact us website form, chat with us, order a service or sign up for one of our events, webinars or video calls.

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

It is important that you read this privacy policy so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

CONTROLLER

[Aleph Group Inc.](#) is the holding company of different legal entities, including Ad Dynamo, which is the provider of this webpage. When we mention »Ad Dynamo«, »we«, »us«, or »our« in this privacy policy, we are referring to the relevant company, part of the Aleph Group, providing you services and responsible for processing your data, which is also considered to be the data controller of your personal data.

We have appointed a Global Data Protection Officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the Global Data Protection Officer using the details set out below.

CONTACT DETAILS

If you have any questions about this privacy policy or our privacy practices, please contact our Global Data Protection Officer in the following way:

Email address: privacy@alephholding.com.

Address: Aleph Digital Advertising and Marketing Nigeria Ltd. 48 Awolowo Road, Ikoyi, Lagos State, Nigeria

You have the right to make a complaint at any time to your country's [supervisory authority](#). We would, however, appreciate the chance to deal with your concerns before you approach the supervisory authority, so, please contact us in the first instance.

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 March 7, 2025. 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. For example we use Google forms, Salesforce, Statamic, Netlify, Typeform, Learndash, Calendly, Hubspot, Hotjar, AWS and Mailchimp for the contact forms on the website, occasionally we embed videos from our youtube channel and we might link to content on our partner's websites or other similar sites. 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. When you leave our website, we encourage you to read the privacy policy of every website you visit.

THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

Identity Data includes first name, last name, email address, company, country, username or similar identifier, title, date of birth, gender, image (whether static or moving) and voice (jointly, your “image”).

Contact Data includes billing address, delivery address, email address and telephone number.

Financial Data includes bank account numbers.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Profile Data includes your username and password, profile ID, ad account ID, Business Manager ID, FB Page ID, campaign results, test results, orders made by you, your interests, preferences, feedback, and survey responses and any other Meta related information you share with us while using our chat feature.

Usage Data includes information about how you use our website, services, etc. All of the information processed is used to solve our clients issues/restrictions and improve their advertising on Meta platforms through us.

Marketing and Communication Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may 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 is not considered personal data in law as this data 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 privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about race or ethnicity, 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 offenses.

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 goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Personal Data by filling in forms or by corresponding with us by chat, post, phone, email, participation in synchronous live meetings or otherwise. This includes personal data you provide when you;

- Apply for our products or services;
- Create an account on our website;
- Subscribe to our service or publications;
- Contact us by any means of communication (for example using our chat feature).
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We might receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- 1 Analytics providers, such as D&B, local reports.
- 2 Advertising networks
- 3 Search information providers
- 4 Contact, Financial and Transaction Data from providers of technical, payment services, such as COFACE.
- 6 Identity and Contact Data from publicly available sources
- 7 Social media interactions with any of our channels

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.
- Where we need to comply with a legal obligation.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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 data. Please contact us if you need details about

the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	<ol style="list-style-type: none"> 1. Identity 2. Contract 3. Profile 	<ol style="list-style-type: none"> 1. Performance of a contract with you 2. Necessary to comply with a legal obligation 3. Necessary for our legitimate interests (to conduct a background check)
To process and deliver your order: <ol style="list-style-type: none"> 1. Manage payments 2. Collect and recover money owed to us 	<ol style="list-style-type: none"> 1. Identity 2. Contract 3. Financial 4. Transaction 5. Marketing and Communications 	<ol style="list-style-type: none"> 1. Performance of a contract 2. Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: <ol style="list-style-type: none"> 1. Notifying you about changes to our terms or privacy policy 	<ol style="list-style-type: none"> 1. Identity 2. Contract 3. Profile 	<ol style="list-style-type: none"> 1. Performance of a contract with you 2. Necessary to comply with a legal obligation 3. Necessary for our legitimate interests (to keep our records updated)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ol style="list-style-type: none"> 1. Identity 2. Contract 3. Technical 	<ol style="list-style-type: none"> 1. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent

		<p>fraud and in the context of a business reorganization exercise)</p> <p>2. Necessary to comply with a legal obligation</p>
To use data analytics to improve our website, products/services, marketing, customer relationship experience	<ol style="list-style-type: none"> 1. Technical 2. Usage 	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ol style="list-style-type: none"> 1. Identity 2. Contact 3. Technical 4. Usage 5. Profile 6. Marketing and Communications 	Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You might receive marketing communications from us if you have requested information from us or purchased services from us and you have not opted out of receiving that marketing.

THIRD PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties 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.

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

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

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.

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.

DISCLOSURES OF YOUR PERSONAL DATA

If required we may share your personal data with the parties set out below for the purposes set out in the table “Purposes for which we will use your personal data” above.

- Internal Third Parties *[see Glossary]*.
- External Third Parties *[see Glossary]*.
- Specific Third Parties, such as our Partners, for the purpose of direct communications or quality assessments.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. 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.

INTERNATIONAL TRANSFERS

We might share your personal data within the Aleph Group with employees, agents, contractors and other third parties who have a business need to know.

TRANSFERRING DATA OF EU VISITORS

In some specific cases we will have to transfer personal data of an EU visitor also outside the EU.

Also some of our external third parties are based outside the EU so their processing of your personal data will involve a transfer of data outside the EU.

Whenever we transfer your personal data out of the EU, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the EU which give personal data the same protection it has in the EU.
- Using also Standard Contractual Clauses.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EU.

DATA SECURITY

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

DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfill 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 unauthorized 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.

You can request details of retention periods for different aspects of your personal data by contacting us.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

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.

YOUR LEGAL RIGHTS IF YOU ARE A VISITOR FROM EU

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us at: privacy@alephholding.com.

THE GROUNDS ON WHICH WE PROCESS YOUR PERSONAL INFORMATION

We can process your personal information solely if we have a legal basis for such processing.

Legal bases are as follows:

- your consent to the relevant processing activities;
- compliance with a legal or regulatory obligation that lies with us;
- the carrying out of public policies provided in laws or regulations or based on contracts, agreements and similar legal instruments;
- studies conducted by research entities, preferably carried out on anonymized personal information;

- the carrying out of a contract and its preliminary procedures, in cases where you are a party to said contract;
- the exercising of our rights in judicial, administrative or arbitration procedures;
- protection or physical safety of yourself or a third party;
- the protection of health – in procedures carried out by health entities or professionals;
- our legitimate interests, provided that your fundamental rights and liberties do not prevail over such interests; and
- credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

CATEGORIES OF PERSONAL INFORMATION PROCESSED

To find out what categories of your personal information are processed, you can read the section titled “The Data We Collect About You” within this document.

WHY WE PROCESS YOUR PERSONAL INFORMATION

To find out why we process your personal information, you can read the sections titled “Purposes for which we will use your personal data” within this document.

HOW TO FILE YOUR REQUEST

You can file your express request to exercise your rights free from any charge, at any time, by using the contact details provided in this document, or via your legal representative.

HOW AND WHEN WE WILL RESPOND TO YOUR REQUEST

We will strive to promptly respond to your requests.

In any case, should it be impossible for us to do so, we'll make sure to communicate to you the factual or legal reasons that prevent us from immediately, or otherwise ever, complying with your requests. In cases where we are not processing your personal information, we will indicate to you the physical or legal person to whom you should address your requests, if we are in the position to do so.

In the event that you file an access or personal information processing confirmation request, please make sure that you specify whether you'd like your personal information to be delivered in electronic or printed form.

You will also need to let us know whether you want us to answer your request immediately, in which case we will answer in a simplified fashion, or if you need a complete disclosure instead.

In the latter case, we'll respond as soon as possible, providing you with all the information on the origin of your personal information, confirmation on whether or not records exist, any criteria used for the processing and the purposes of the processing, while safeguarding our commercial and industrial secrets.

In the event that you file a rectification, deletion, anonymization or personal information blocking request, we will make sure to immediately communicate your request to other parties with whom we have shared your personal information in order to enable such third parties to also comply with your request – except in cases where such communication is proven impossible or involves disproportionate effort on our side.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

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 as soon as possible and at least within one month. Occasionally it could take us longer than a month 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.

YOU EXPRESSLY ACKNOWLEDGE THAT YOU HAVE READ THIS PRIVACY POLICY AND YOU UNDERSTAND THE RIGHTS, OBLIGATIONS, TERMS AND CONDITIONS SET FORTH HEREIN AND BY USING OUR WEBSITE YOU EXPRESSLY CONSENT TO BE BOUND BY THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND GRANT US THE RIGHTS SET FORTH HEREIN.

GLOSSARY

LAWFUL BASIS

Legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

INTERNAL THIRD PARTIES

Other companies in the Aleph Group acting as joint controllers or processors and who are based in EU and non-EU countries and provide services, such as IT and Legal internal support.

EXTERNAL THIRD PARTIES

Service providers acting as processors who provide IT and system administration services.

Professional advisers acting as processor or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

Regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

You have the 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 data we hold about you and to check that we are lawfully processing it.

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.

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 to continue 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.

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. 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.

Request restrictions of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data’s accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- 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.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 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.

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.