

Shehu Musa Yar'Adua Foundation

Privacy Policy

June, 2025

The Shehu Musa Yar'Adua Foundation ("us", "we", "Foundation") are a not-for-profit organization established to promote national unity, good governance, and social justice.

This Privacy Policy ("policy") explains how we may collect and use any personal information that we obtain about you, and your rights in relation to that information. It also sets out how to contact us if you have any questions about this policy or desire to make a complaint about how we handle your personal information.

We use cookies on our website, and this policy should be read alongside our [Cookies Policy](#). This policy does not apply to any products, services, websites, or content that are offered by third parties or have their own privacy policy. Please be aware that we are not responsible for the content or privacy practices of such other third-party websites or services. We encourage our users to read the privacy statements of any other website that collects personal information visited after leaving the website. When you use the website or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- a. Advertisers, ad networks and ad servers;
- b. Analytics companies;
- c. Your mobile device manufacturer;
- d. Your mobile service provider.

These third parties may use tracking technologies to collect information about you when you use the website. The information they collect may be associated with your personal information, include personal information, or about your online activities over time and across different websites, apps and other websites for online services. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content. We do not control these third-party tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

1. General

- 1.1. Please read this privacy policy carefully as it sets out the basis on which we collect any personal information from you, or that you provide to us and how we use it in the operation of the website.
- 1.2. This privacy policy describes:
 - a. what personal information we collect about you
 - b. how we obtain your personal information
 - c. how we use your personal information
 - d. on what basis we use your personal information
 - e. how long we keep your personal information
 - f. who we share your personal information with

- g. how we protect your personal information
 - h. which countries we transfer your personal information to
 - i. your rights regarding your personal information
- 1.3. This privacy policy covers:
 - a. registered users of the website;
 - b. subscribers of our newsletter;
 - c. guests on the website;
 - d. Individuals who engage with us offline, including clients, customers, and attendees at our events, meetings, or physical locations.
- 1.4. Any changes we may make to this privacy policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy. Your continued use of the Service after any change in this Privacy Policy will constitute your acceptance of the changes. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you and for periodically visiting this privacy policy to check for any changes.
- 1.5. This Privacy Policy is an agreement (collectively, this “Agreement”) between you (“You” or “your” or “you”), a user of the Service, and us. By using our website, you acknowledge and agree to this policy, and consent to our use of cookies in accordance with the terms of this Agreement.

2. Data We Collect from You

- 2.1. While on our website as a user or a guest, we may collect, store, and use the following kinds of personal information:
 - a. Information and content you provide;
 - b. Platform credentials;
 - c. Information about your computer, and your visits to and use of the website including your internet protocol (IP) address, geographical location, browser type and version, device characteristics, operating system, language preferences, referral source, and information on action taken on the website, such as; length of visit, page views and website navigation paths;
 - d. Information that you provide to us when visiting the website including your email address;
 - e. Information that you provide or that is collected by and from Facebook, Twitter, Instagram or other social media platforms, whether existing now or in the future, when providing information on the website including your name, pictures, gender, date of birth, educational details, employment details and other personal data or information;

- f. Information that you provide to us to subscribe to our email notifications and/or newsletters or text message alerts, or participate in one of our online forums or communities including your name, postal address, email address, telephone and/or mobile numbers;
 - g. Information that you provide to us when using the website or that is generated in the course of the use of those services including the timing, frequency and pattern of service use;
 - h. Information relating to any use of our services on the website or any other transactions that you enter into through the website including your name, address, telephone number, email address, and any financial details;
 - i. Content that you submit directly to the website or via links on social media networks, forums, blogs, message boards, chat rooms or similar functionality, including audio recordings, software code, videos, photos, images, text, information (including, without limitation, personal information), user comments, and any other content (collectively, “user content”);
 - j. Information contained in or relating to any communication with us or our third-party service providers for customer support or other communications, including, without limitation, records and copies of correspondence and responses to surveys for research purposes;
 - k. Information from and about the devices you access the website with, including attributes such as the operating system, hardware version, device settings, file and software names, types, battery and signal strength, device identifiers, device location, specific geographic locations (such as gps, bluetooth, wifi signals), connection information such as the name of your mobile operator or isp, browser type, language, time zone, mobile phone number and IP address;
 - l. Information about our users, such as the numbers and frequency of users and their characteristics and information about similar groups of users, certain age groups or users that live in a particular geographical area. This data is only used in the aggregate as a statistical measure and not in a manner that would identify you personally. Aggregate information generally is collected through the use of cookies and beacons;
 - m. Information about physical location that is sufficiently precise to allow us to locate a specific person or device (“location information”). We only collect location information with your permission (e.g., such as when you agree to provide it to us after you initially access or use the website). We may use location information to provide you with content and services that are relevant to a particular location, such as advertising, search results, and directions;
 - n. Meta data and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts and address book information; and
 - o. Any other personal information that you choose to send to us.
- 2.2. We also collect and store data that you submit to us via email and through any of our forms.

- 2.3. We collect the information above by using cookies. Kindly visit our website at <https://yaraduafoundation.org/smyf/> to download our Cookies Policy. It explains what cookies we use on our website, why we use them, and how you can control them.

3. How We Obtain Your Personal Information

- 3.1. We collect information directly from you as part of our processes as necessary in the course of admitting you into our programmes.
- 3.2. We collect your personal information while monitoring and analysing our technological tools and services, including our website, email and other communications sent to and from the Foundation.
- 3.3. We gather information about you when you provide it to us, or interact with us directly, for instance engaging with our staff or registering on one of our digital platforms, applications or training courses.
- 3.4. We may collect or receive information about you from other sources, such as keeping the contact details and professional information we already hold for you accurate and up to date using publicly available sources, including LinkedIn, or collecting information from third-party sources as part of our business acceptance procedures

4. How We Use Your Personal Information

- 4.1. The Foundation collects and processes personal information about you in a number of ways, including through your use of our website and in the provision or promotion of services by us.
- 4.2. We use that information:
 - 4.2.1. To provide and improve this website, including auditing and monitoring its use, and ensuring content is provided in the most effective way for you and the devices you are using.
 - 4.2.2. To provide and improve our services to you and to monitor compliance with our policies and standards.
 - 4.2.3. To manage access to our premises and for security purposes.
 - 4.2.4. To provide information requested by you.
 - 4.2.5. To manage our relationship with you.
 - 4.2.6. For professional networking purposes.
 - 4.2.7. To fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims, complying with our legal obligations, preventing crime or fraud and protecting the rights of third parties
 - 4.2.8. For the purposes of recruitment.
- 4.3. Use of the Foundation's website

A number of features on our website invite you to provide us with personal information, such as the vacancy application facility in the 'Careers' section of our

website and our email query facilities. The purpose of these facilities is apparent at the point where you provide your personal information and we use that information only for those purposes.

4.4. Marketing and other emails

To ensure that we provide content that is of interest, we utilize technology in our emails and website which logs the nature of your interaction with the links in our emails, time, date, and duration of visit to our website. We may use this information to determine what future content is likely to be of interest to you. If you would prefer that we do not record this information, please do not click on the links.

We will record your response to our emails and may use this to determine what future content is likely to be of interest to you. For example, if you accept an invitation to a seminar or program, we will record this and may send you emails relevant to that seminar and the topics it covers in the future.

We may also use a relationship management tool where permitted by applicable local law, to assess the strength of the relationship between individuals in the Foundation and our partners or potential partners based on the frequency of email contact between them. We use that information in order to assess, analyse and improve the services that we provide.

If you receive communication from us and no longer wish to do so, you may unsubscribe at any time by sending an email to info@yaraduafoundation.org.

4.5. Meetings, Events and Seminars

We will collect and process personal information about you in relation to your attendance at our offices or at an event, training or seminar organised by us or our partners. We will only process and use your personal information in order to cater for your needs and meet any legal or regulatory obligations we may have. We may share your information with internal or external Information Technology personnel, and other service providers or business partners involved in organising or hosting the relevant event.

5. **On What Basis Do We Use Your Personal Information?**

5.1. In compliance with the Nigeria Data Protection Act 2023 (NDPA), and other relevant data protection regulations in Nigeria, we use your personal data for the following:

5.1.1. To carry out our legitimate activities as a foundation, including engaging with individuals, beneficiaries, donors, volunteers, and partners to deliver our services and programmes.

5.1.2. To comply with our legal and regulatory responsibilities, including reporting obligations to regulators, government agencies, and funding bodies.

5.1.3. To establish, exercise, or defend legal claims or proceedings where necessary.

5.1.4. Based on your consent, where required by law — for example, for direct communications or where sensitive personal data is involved.

5.1.5. For other legitimate interests, such as monitoring the effectiveness of our initiatives, improving our services, or maintaining organisational records. Provided such use does

not override your fundamental rights and freedoms. Please refer to the section on 'How we use your personal information' for more detail.

6. How Long We Keep Your Personal Information

Your personal information will be retained in accordance with our data retention policy which categorises all of the information held by the Foundation and specifies the appropriate retention period for each category of data. The retention periods are based on the requirements of applicable data protection laws and the purpose for which the information is collected and used, taking into account legal and regulatory requirements to retain the information for a minimum period, limitation periods for taking legal action, good practice and the Foundation's business purposes.

7. Who We Share Your Personal Information With

- 7.1. Any information that you provide to us may be shared with and processed by any entity in the worldwide network of the Foundation and our associated partners.
- 7.2. We may also share your personal information with certain trusted third parties in accordance with contractual arrangements in place with them, including:
 - a. Our professional advisers and auditors
 - b. Our insurers and insurance brokers
 - c. Suppliers to whom we outsource certain support services such as word processing, translation, photocopying and document review
 - d. IT and other service providers to the Foundation
 - e. Third parties engaged in the course of the services we provide to our beneficiaries and with their prior consent.
 - f. Third parties involved in hosting or organising events or seminars
- 7.3. Where necessary, or for the reasons set out in this policy, personal information may also be shared with regulatory authorities, courts, tribunals, government agencies and law enforcement agencies. While it is unlikely, we may be required to disclose your information to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.
- 7.4. If we re-organise or transfer all or part of our business in the future, we may need to transfer your information to the Foundation's new entities or to third parties through which the objectives of the Foundation will be carried out.
- 7.5. The Foundation may use social media sites including Facebook, LinkedIn and Twitter. If you use these social media sites, you should review their privacy policy for more information on how they deal with your personal information.

8. How We Protect Your Personal Information

- 8.1. We use a variety of technical and organisational measures to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection laws.
- 8.2. This includes the use of data loss protection tools in order to protect the Foundation, our employees, partners and third-party contractors, from cyber threats and the loss of sensitive information.

- 8.3. The Foundation holds the internationally recognised security standard in respect of its document management and email systems and the supporting infrastructure for its offices. This is an independently verified certification that information security is managed in line with international best practice.

9. Countries We Transfer Your Personal Information To

- 9.1. In order to provide our services effectively, we may need to transfer your personal information to locations outside the jurisdiction in which you provide it or where you are viewing this website for the purposes set out in this privacy policy. This may cause a transfer of your information outside Nigeria.
- 9.2. The level of data protection in countries outside Nigeria may differ from the measures applicable within Nigeria. Where this is the case, we will implement appropriate measures to ensure that your personal information remains protected and secure in accordance with applicable data protection laws. The NDPA standard contractual clauses are in place between the Foundation and the entities that share and process personal data.
- 9.3. Where our third-party service providers process personal data outside Nigeria in the course of providing services to us, our written agreement with them will include appropriate measures, usually standard contractual clauses.

10. Changes to our Privacy Policy

We will update this Privacy Policy from time to time to reflect changes in the way we use your personal data. Please check our website regularly for any updates.