AFRIBIOTECH LEAN SIX SIGMA

Privacy Policy

How we collect, use, share and protect your personal data, and the rights you have

Document	Privacy Policy
Version	1.3
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Website	https://afribiotech.com
Contact	info@afribiotechleansixsigmarotterdam.com Nigeria: +234 903 487 0709 | Netherlands: +31 6 2163 6515

1. Introduction

Afribiotech respects your privacy. This Privacy Policy explains how we process personal data when you visit https://afribiotech.com, use our linked platforms, contact us, enrol on Lean Six Sigma training, sit an examination, submit a certification project, apply for a job, or otherwise interact with us.

We have written this policy to meet the transparency requirements of the EU General Data Protection Regulation (GDPR, Regulation (EU) 2016/679, Articles 13 and 14), the Dutch GDPR Implementation Act (Uitvoeringswet AVG, "UAVG"), the Nigeria Data Protection Act 2023 ("NDPA"), the NDPA General Application and Implementation Directive 2025 ("GAID"), and, for visitors in the United Kingdom, the UK GDPR and Data Protection Act 2018.

2. Who is responsible for your data

Afribiotech operates through three trading names that together form Afribiotech. Your personal data is processed by them as **joint controllers** under Article 26 GDPR and as data controllers under the NDPA:

Entity	Details	Role
AfriBioTech Limited	17 Babs Ogunwole Street, Ifako-Ijaiye, Lagos 101232, Nigeria CAC Company Registration No.: 8294878 ISO 9001:2015 certified	Head office and global trading hub: runs most of our global trade, including international and corporate contracts; contracting party for NGN-denominated enrolments and services delivered in Nigeria
Afribiotech	Dordtselaan 238D, 3073 GV Rotterdam, the Netherlands Chamber of Commerce (KVK): 96398868 VAT: NL005207965B49 CRKBO-registered training institution	Dutch vocational training institution; contracting party for EUR-denominated training enrolments and VAT-exempt vocational training in the Netherlands and the EU
Afribiotech Lean Six Sigma Rotterdam	Dordtselaan 238D, 3073 GV Rotterdam, the Netherlands Chamber of Commerce (KVK): 96398868 Member of The CPD Certification Service	Lean Six Sigma training hub and certification brand; operates the Exam Platform and issues CPD-recognised certificates

Afribiotech and Afribiotech Lean Six Sigma Rotterdam (KVK 96398868) are the main point of contact for individuals in the EU, EEA and UK. AfriBioTech Limited is the main point of contact for individuals in Nigeria and

the rest of Africa. You may exercise your rights against any of them, and we will coordinate the response. The essence of our joint-controller arrangement is available on request.

Data Protection Officer

We have designated a Data Protection Officer (DPO) in accordance with the NDPA and the GAID. You can contact the DPO at **info@afribiotechleansixsigmarotterdam.com** (subject line: "Attention: Data Protection Officer") or by post to either address above.

3. The laws we follow

Jurisdiction	Law or framework	Regulator
European Union	General Data Protection Regulation (EU) 2016/679; ePrivacy Directive 2002/58/EC; EU Artificial Intelligence Act (EU) 2024/1689 (transparency, Art. 50)	National data protection authorities
Netherlands	UAVG (GDPR Implementation Act); Telecommunications Act (Telecommunicatiewet), Art. 11.7 (e-marketing) and Art. 11.7a (cookies); Dutch Civil Code; State Taxes Act (record retention)	Autoriteit Persoonsgegevens (AP); ACM
Nigeria	Nigeria Data Protection Act 2023; NDPA General Application and Implementation Directive 2025 (which replaced the NDPR 2019); Cybercrimes (Prohibition, Prevention, etc.) Act 2015 (as amended 2024); Federal Competition and Consumer Protection Act 2018	Nigeria Data Protection Commission (NDPC); FCCPC
United Kingdom	UK GDPR; Data Protection Act 2018; Privacy and Electronic Communications Regulations (PECR)	Information Commissioner’s Office (ICO)
Global	OECD Privacy Guidelines; ISO 9001:2015 quality management controls of AfriBioTech Limited, which runs most of our global trade	—

4. The personal data we collect

Category	Examples	Source
Identity and contact data	First and last name, email address, phone number, country	You (registration, contact and enquiry forms, email, WhatsApp, phone)
Professional data	Organisation name, job title, sector, professional background and motivation, project interest	You (registration form); your employer if it enrols you
Enrolment data	Chosen Belt or programme, cohort, availability and commitment confirmation, attendance records	You; our trainers
Payment data	Payment receipts you upload, payer name, amount, date, bank reference, invoice details. Card data is handled by Stripe and is never stored by us.	You; Stripe; our banks
Assessment and certification data	Exam answers, scores, timestamps, attempt history, supervisor feedback, project submissions, certificate number and issue date	You; Exam Platform; project supervisors
Project data	Process data, financial savings figures and documents from your host organisation. These may incidentally contain personal data of third parties.	You; your host organisation
Communications	Emails, WhatsApp messages, call notes, complaints and feedback	You
AI tool data	Questions and content you enter into ARIA and the AI outputs generated	You

Category	Examples	Source
Technical and usage data	IP address, browser and device type, pages visited, timestamps, cookie and local-storage identifiers, security logs	Your device; our website and platform providers (see Cookie Policy)
Marketing preferences	Whether you agreed to receive news and offers, and your unsubscribe history	You
Recruitment data	CV, cover letter, work history and references for job applicants	You; referees you name

Sensitive data. We do not ask for special category data (such as health, religion or ethnic origin) or "sensitive personal data" under section 30 of the NDPA. Please do not include it in forms, project submissions or AI tools. If you choose to tell us about a disability so that we can make reasonable adjustments (for example, extra exam time), we will process it only with your explicit consent and only for that purpose.

If you do not provide data. Some information (such as your name, email and payment confirmation) is required to enrol you and issue a certificate. Without it, we cannot provide the Service.

5. Why we use your data and our legal basis

We only process personal data where we have a lawful basis under Article 6 GDPR and section 25 of the NDPA:

Purpose	Legal basis
Answering enquiries and sending information you request	Steps prior to a contract at your request; legitimate interests in responding to business enquiries
Processing registrations, enrolling you and delivering training, coaching and consultancy	Performance of a contract
Taking payment, verifying receipts, invoicing and refunds	Performance of a contract; legal obligation
Running exams, supervising projects, issuing and verifying certificates	Performance of a contract; legitimate interests in protecting the integrity and value of our certification
Preventing cheating, fraud and misuse of our platforms	Legitimate interests; legal obligation where applicable
Quality assurance, audits and accreditation (CRKBO/CPION, The CPD Certification Service, ISO 9001:2015)	Legitimate interests in maintaining accreditations; legal obligation where audits are mandatory
Handling complaints and legal claims	Legal obligation; legitimate interests
Keeping financial and tax records	Legal obligation (Dutch and Nigerian tax and company law)
Sending marketing emails and newsletters	Consent; or, for existing customers, legitimate interests in marketing similar services with an easy opt-out (Art. 11.7 Telecommunicatiewet)
Operating ARIA and other AI features	Performance of a contract or your request; legitimate interests in providing learning support
Website security and essential operation, including strictly necessary cookies	Legitimate interests; strictly necessary exemption for essential cookies (see our Cookie Policy). We do not use analytics or marketing cookies.
Publishing testimonials, photos or anonymised case studies	Consent
Recruitment	Steps prior to an employment contract; consent for keeping your CV for future vacancies

Where we rely on legitimate interests, we have balanced our interests against your rights and freedoms. You may ask us for more information about this balancing test. Where we rely on consent, you can withdraw it at any time without affecting the lawfulness of processing before withdrawal.

6. Automated decision-making

Multiple-choice exam answers on our Exam Platform may be scored automatically. A failed automated score affects whether you receive a certificate. You have the right to request human review of any automated result, to express your point of view and to contest the decision (Article 22 GDPR; section 37 NDPA). Project assessments and final certification decisions for Green Belt and above are always made by a human supervisor. We do not use profiling for marketing.

7. Who we share your data with

We do not sell your personal data. We share it only where necessary, with:

- **Our group and partners:** among AfriBioTech Limited, Afribiotech and Afribiotech Lean Six Sigma Rotterdam as joint controllers; and with Europharma Supplies EMEA where it collects euro payments on our behalf.
- **Trainers and project supervisors:** our Master Black Belt coaches, who are bound by confidentiality obligations.
- **Service providers (processors):** website hosting and content management (WordPress/Elementor), Netlify (hosting of our training, exam, Body of Knowledge and ARIA platforms), Stripe (payments), video-conferencing and email providers, AI model providers powering ARIA, and IT support. They act only on our instructions under data processing agreements (Article 28 GDPR; section 29 NDPA).
- **Banks:** Access Bank plc (Nigeria) and Knab (the Netherlands) for payment processing and reconciliation.
- **Communication platforms:** WhatsApp (Meta) and LinkedIn when you choose to contact us through them. These platforms process data under their own privacy policies.
- **Accreditation and audit bodies:** CRKBO/CPION (for Afribiotech), The CPD Certification Service (for Afribiotech Lean Six Sigma Rotterdam) and the ISO 9001 certification body of AfriBioTech Limited, which may inspect training and assessment records during audits.
- **Your employer or sponsor:** if your organisation enrols or pays for you, we may share attendance, progress and results with it.
- **Certificate verification:** when an employer or other third party asks us to verify a certificate, we confirm only your name, Belt, certificate number, issue date and status.
- **Professional advisers and authorities:** lawyers, accountants, auditors, tax authorities, regulators (including the AP and the NDPC), courts and law enforcement, where required by law or to defend legal claims.

8. International data transfers

Because we operate in both the Netherlands and Nigeria, and use international service providers, your data may be transferred across borders:

- **From the EU/EEA to Nigeria and other third countries.** Nigeria does not have an EU adequacy decision. We protect these transfers with the European Commission's Standard Contractual Clauses (Decision (EU) 2021/914), supported by a transfer impact assessment and supplementary measures such as encryption and access controls (Chapter V GDPR).
- **From Nigeria to other countries.** We transfer data only where the recipient country or organisation ensures an adequate level of protection, or using appropriate safeguards such as contractual clauses or binding corporate rules, or another basis recognised under sections 41 to 43 of the NDPA and the GAID.

- **To the United States.** Where a provider is located in the US, we rely on its certification under the EU-U.S. Data Privacy Framework (and UK Extension), or on Standard Contractual Clauses.
- You may request a copy of the safeguards we use by contacting the DPO.

9. How long we keep your data

Data	Retention period
Enquiries that do not lead to enrolment	2 years after our last contact
Registration, enrolment and attendance records	7 years after the end of the programme
Exam answers and scripts	2 years after the result is issued (longer if a complaint or appeal is open)
Project submissions and supervisor feedback	2 years after the certification decision
Certificate register (name, Belt, number, date, status)	As long as needed to allow verification of your certificate, and at least 10 years. You may ask us to remove your entry from the public verification service.
Financial records, invoices and payment receipts	7 years (Dutch tax law, Art. 52 State Taxes Act) and at least 6 years under Nigerian law
Complaints	1 year after the complaint is closed (minimum required by the Dutch Quality Code), or longer while a claim is possible
ARIA conversation data	Up to 30 days, unless you save the output or the law requires longer
Marketing data	Until you unsubscribe or withdraw consent, after which we keep a suppression record
Job applications	4 weeks after the end of the recruitment process, or 1 year with your consent
Cookies and local storage	As set out in our Cookie Policy

When a retention period ends, we securely delete or anonymise the data.

10. How we protect your data

We apply appropriate technical and organisational measures (Article 32 GDPR; section 39 NDPA), including encrypted connections (HTTPS/TLS), role-based access controls, strong authentication on administrative accounts, confidentiality agreements with staff, trainers and processors, controlled document management under our ISO 9001:2015 system, regular backups, and staff training on data protection.

Data breaches. If a personal data breach occurs that is likely to result in a risk to your rights and freedoms, we notify the Autoriteit Persoonsgegevens and/or the Nigeria Data Protection Commission within 72 hours of becoming aware of it, and we inform you without undue delay where the risk to you is high (Articles 33 and 34 GDPR; section 40 NDPA; GAID).

Your part. Never send us full card details by email or WhatsApp. Only pay into the bank accounts listed in our Terms of Service, and verify any change of payment instructions with us directly.

11. Your rights

Subject to the conditions and exceptions in the law, you have the right to:

Right	What it means	Legal basis
Be informed	Receive clear information about how we use your data (this policy).	GDPR Arts. 13–14; NDPA s. 27
Access	Obtain a copy of your personal data.	GDPR Art. 15; NDPA s. 34
Rectification	Have inaccurate or incomplete data corrected, including the name on your certificate.	GDPR Art. 16; NDPA s. 34
Erasure	Have your data deleted where there is no longer a lawful reason to keep it.	GDPR Art. 17; NDPA s. 34
Restriction	Ask us to limit processing while a dispute is resolved.	GDPR Art. 18; NDPA s. 34
Portability	Receive data you gave us in a structured, machine-readable format, or have it sent to another controller.	GDPR Art. 20; NDPA s. 38
Object	Object to processing based on legitimate interests, and to direct marketing at any time.	GDPR Art. 21; NDPA s. 36
Automated decisions	Request human review of automated exam scoring.	GDPR Art. 22; NDPA s. 37
Withdraw consent	Withdraw consent at any time, as easily as you gave it.	GDPR Art. 7(3); NDPA s. 35

To exercise a right, email info@afribiotechleansixsigmarotterdam.com (Attention: Data Protection Officer). We may ask you to verify your identity. We respond within one month of receipt. This may be extended by up to two further months for complex or numerous requests, in which case we will tell you why. Requests are free of charge unless they are manifestly unfounded or excessive.

Right to complain

If you are unhappy with how we handle your data, please contact us first so we can try to resolve it. You also have the right to lodge a complaint with a supervisory authority, in particular in the country where you live or work or where the alleged infringement took place:

- **Netherlands:** Autoriteit Persoonsgegevens, www.autoriteitpersoonsgegevens.nl
- **Nigeria:** Nigeria Data Protection Commission, www.ndpc.gov.ng
- **United Kingdom:** Information Commissioner's Office, www.ico.org.uk
- **Other EU/EEA countries:** your national data protection authority, listed at www.edpb.europa.eu

12. Children

Our Services are designed for adults. We do not knowingly collect personal data from anyone under 16 in the EU (Article 5 UAVG) or from anyone under 18 in Nigeria (section 31 NDPA) without verifiable consent from a parent or guardian. If you believe a child has given us data without such consent, contact us and we will delete it.

13. Marketing

We send marketing emails, newsletters and offers (such as seasonal discounts) only if you opted in, or if you are an existing customer and we are promoting similar training services, in which case every message includes a simple unsubscribe link. You can opt out at any time by clicking "unsubscribe", replying "STOP" on WhatsApp, or emailing info@afribiotechleansixsigmarotterdam.com. We do not share your data with third parties for their own marketing.

14. AI features

When you use ARIA or another AI feature, you are interacting with an AI system, not a human. Your inputs are sent to our AI model provider to generate a response. We configure our AI tools so that your inputs are not used to train third-party models where the provider offers that option. Please do not enter sensitive personal data or confidential information about other people or your employer.

15. Cookies

We only use strictly necessary cookies and similar technologies that are needed for our website and platforms to work securely. These do not require consent, so our website does not show a cookie banner. We do not use analytics, advertising or tracking cookies. If we ever introduce them, we will first ask for your consent through a cookie banner. Full details, including how to block cookies in your browser, are in our **Cookie Policy**, available from the footer of every page.

16. Third-party websites

Our website links to third-party sites and services, such as LinkedIn, WhatsApp, Stripe payment pages, Microsoft Copilot and Google Maps. We are not responsible for their privacy practices. Please read their privacy policies before providing personal data.

17. Changes to this policy

We review this policy at least annually as part of our NDPA data protection audit and update it when our processing or the law changes. The "Last updated" date shows the latest version. We will notify you of material changes by email or a notice on our website.

18. Contact us

Channel	Details
Email (DPO)	info@afribiotechleansixsigmarotterdam.com, subject "Attention: Data Protection Officer"
Netherlands	Afribiotech / Afribiotech Lean Six Sigma Rotterdam, Dordtselaan 238D, 3073 GV Rotterdam | +31 6 2163 6515
Nigeria	AfriBioTech Limited, 17 Babs Ogunwole Street, Ifako-Ijaiye, Lagos 101232 | +234 903 487 0709