



HONEYTREAT GROUP PRIVACY POLICY

In Compliance with the Nigeria Data Protection Act 2023 (NDPA)

Document Number	Version	Effective Date	Review Date
HTG-DPC-PP-001	1.0	01 May 2025	01 May 2026
Prepared By	Queen Ajah		
Reviewed By			
Approved By	Bldr. Samson Soyebi		

REVISION HISTORY

Rev.	Date	Author	Description of Change	Approved By
1.0	01 May 2025	Compliance officer	Initial issue NDPA 2023 compliant privacy policy	Group MD / CEO

DISTRIBUTION LIST

Copy Holder	Department / Role	Distribution Method
All Trainees & Students	Honeytreat Trade Academy	Website / Induction Pack
All Employees	All Departments	HR Induction / Intranet
Job Applicants	Recruitment	Application Portal / Email
Data Protection Officer	Compliance / Legal	Master Copy (Controlled)

NOTE: Printed copies of this document are UNCONTROLLED. The controlled master is held by the Data Protection Officer. Verify currency before use.

1. Purpose

This Privacy Policy defines the framework by which Honeytreat Group ("the Group", "HTG", "we", "us") collects, processes, stores, shares, and destroys personal data relating to trainees, students, employees, job applicants, contractors, business partners, and website visitors.

This document has been prepared in full compliance with the Nigeria Data Protection Act 2023 (NDPA), the NDPC General Application and Implementation Directive (GAID) 2025.

2. Scope

This Policy applies to all personal data processing activities conducted by or on behalf of the Honeytreat Group, including:

- Honeytreat Limited — building and engineering services
- Honeytreat Trade Academy Limited — skills training in construction, digital skills, agriculture, and entertainment
- Honeytreat Global Services Ltd – Equipment Leasing
- All subsidiary operations, project sites, training centres in Lagos, Abuja, and other locations
- All digital platforms, websites, and mobile applications operated by the Group

This Policy binds all employees, interns, contractors, and third-party processors acting on behalf of the Group.

3. Definitions and Abbreviations

The following terms are used in this document as defined under the NDPA 2023 (Section 65):

Term	Definition
Personal Data	Any information that identifies or can identify an individual, directly or indirectly.
Sensitive Personal Data	Data revealing health, biometric, ethnic origin, religious, political or sexual orientation information.
Data Subject	The individual to whom personal data relates.
Data Controller	An entity determining the purpose and means of processing personal data. HTG is a Data Controller.
Data Processor	An entity processing personal data on behalf of a Data Controller.
Processing	Any operation on personal data including collection, storage, use, disclosure, or deletion.
NDPA	Nigeria Data Protection Act 2023.
NDPC	Nigeria Data Protection Commission — the regulatory authority.

GAID	General Application and Implementation Directive 2025 (issued by NDPC).
DPO	Data Protection Officer.
DPIA	Data Protection Impact Assessment.
DPA	Data Processing Agreement.

4. Normative References

- Nigeria Data Protection Act 2023 (NDPA)
- NDPC General Application and Implementation Directive (GAID) 2025
- Constitution of the Federal Republic of Nigeria 1999 (as amended), Section 37
- Companies and Allied Matters Act (CAMA) 2020
- Cybercrimes (Prohibition, Prevention, etc.) Act 2015 (as amended 2024)
- Freedom of Information Act 2011
- Central Bank of Nigeria Consumer Protection Framework 2016
- ISO 9001:2015 — Quality Management Systems (document control principles)

5. Identity of the Data Controller

Field	Details
Organisation	Honeytreat Group (Honeytreat Limited / Honeytreat Trade Academy Limited / Honeytreat Global Services Ltd)
Registered Office	9a Bankole Street, Magodo Phase 1, Ikeja, Lagos State, Nigeria
RC Number (HTG)	8293216
Group MD / CEO	Bldr. Samson Soyebi
Data Protection Officer	To be designated —legal@honeytreatgrp.com
Privacy Enquiries	legal@honeytreatgrp.com
Telephone	08051866667 / 08079378912
Website	www.honeytreatgrp.com

6. Personal Data Collected

6.1 Data Collected Directly from Data Subjects

- Identity Data: full name, date of birth, gender, NIN, valid government-issued ID
- Contact Data: home address, email, phone number, WhatsApp

- Educational & Professional Data: qualifications (HND/B.Eng), certifications, NYSC status, employment history
- Financial Data: bank account details for stipend/salary payment, payment records
- Photographic Data: passport photographs, identity verification images
- Health Data (where relevant): occupational health assessments for site safety compliance

6.2 Data Collected Automatically

- IP addresses, browser type, and device identifiers from website visits
- Usage data, cookies, and analytics (subject to cookie consent)
- Log data from online application portals

6.3 Data Received from Third Parties

- Referral data from recruitment platforms (e.g., Jobnow Nigeria)
- Background check and verification reports from authorised agencies
- Programme data from partner organisations (TechPro Institute, ISHK, LSETF, NBC)

7. Lawful Basis for Processing (NDPA 2023, Section 25)

We process personal data only where a valid lawful basis exists. The applicable basis for each processing activity is documented in our Record of Processing Activities (ROPA — HTG-DPC-ROPA-001).

NDPA 2023 Basis	When Applied	Example — Honeytreat Context
Consent s.25(1)(a)	Freely given, specific, informed	Marketing emails; newsletter subscriptions; cookie analytics
Contract s.25(1)(b)	Necessary for contract performance	Enrolment processing; stipend payment; employment contract
Legal Obligation s.25(1)(c)	Compliance with Nigerian law	FIRS tax reporting; NSITF / pension deductions; ITF levy
Vital Interests s.25(1)(d)	Protect life / safety	Medical emergency on project site or training centre
Legitimate Interests s.25(1)(f)	Proportionate, balancing test passed	IT security monitoring; fraud prevention; service improvement

8. Purposes of Processing

- Enrolment and administration of skills training, vocational, and academic programmes
- Processing of job applications, recruitment, and management of employment relationships
- Payment of stipends, salaries, and statutory deductions (PAYE, pension, NHF)
- Communication with trainees, students, employees, contractors, and business partners
- Marketing and promotion of Group programmes and services (with prior consent)
- Health, safety, and welfare management on project sites and training centres
- Compliance with legal, regulatory, and statutory obligations under Nigerian law
- Audit, monitoring, and continuous improvement of Group operations and quality management
- Statistical analysis and reporting to funders, partners, and regulatory authorities

9. Rights of Data Subjects (NDPA 2023, Sections 34–40)

Data subjects may exercise the following rights by submitting a written request to the DPO (see Section 13). We will respond within 30 days of receipt. Identity verification may be required.

Right (NDPA Reference)	Description	How to Exercise
Right of Access (s.34)	Obtain confirmation and a copy of personal data held about you.	Email: Legal@honeytreatgrp.com
Right to Rectification (s.35)	Request correction of inaccurate or incomplete data.	Written request to DPO
Right to Erasure (s.36)	Request deletion where data is no longer necessary or consent is withdrawn.	Written request to DPO
Right to Restrict Processing (s.37)	Request limitation of processing in specified circumstances.	Written request to DPO
Right to Object (s.39)	Object to processing based on legitimate interests or for direct marketing.	Written request to DPO
Right to Withdraw Consent	Withdraw consent at any time; does not affect prior lawful processing.	Email or cookie preference settings
Right to Lodge Complaint	Complain to the NDPC if rights are infringed.	ndpc.gov.ng info@ndpc.gov.ng

10. Special Categories of Personal Data (NDPA 2023, Section 30)

Sensitive personal data (including health data and biometric information) is processed only where:

- The data subject has given explicit written consent; or
- Processing is necessary for occupational health or safety obligations; or
- Processing is required to comply with obligations under Nigerian employment law; or
- Processing is necessary to protect the vital interests of the data subject.

Additional safeguards apply, including restricted access, enhanced encryption, and mandatory staff training.

11. Children's Personal Data (NDPA 2023, Section 31 & GAID 2025)

- The Group does not knowingly collect personal data from persons under the age of 13 without verifiable parental or guardian consent.
- For persons aged 13 to 17, parental or guardian consent is obtained prior to processing, in line with the NDPA digital age of consent provisions.
- Where data from a child has been inadvertently collected without proper consent, it will be promptly deleted and the NDPC notified if required.

12. Disclosure and Sharing of Personal Data

We do not sell, rent, or trade personal data. Data may be shared only as follows:

- Service Providers / Data Processors: engaged under binding DPAs (NDPA s.43) for payroll, IT, background checks, and related services.
- Regulatory Authorities: NDPC, FIRS, NSITF, NIS, CAC, or law enforcement where required by Nigerian law.
- Partner Organisations: TechPro Institute, ISHK, and certification bodies, solely for programme delivery.
- Professional Advisers: solicitors, auditors, and insurers under obligations of confidentiality.
- Successor Entities: in the event of a merger, acquisition, or restructuring, subject to appropriate notice to data subjects.

13. Cross-Border Transfers (NDPA 2023, Sections 42–43)

Personal data will only be transferred outside Nigeria where:

- The destination country has been designated by the NDPC as providing adequate protection; or
- Appropriate safeguards are in place, including NDPC-approved Standard Contractual Clauses; or
- The data subject has given explicit, informed consent after being made aware of the risks.

14. Data Retention Schedule

Personal data is retained only for as long as necessary for its stated purpose or as required by applicable Nigerian law. Our full retention schedule is maintained in HTG-DPC-RS-001.

Data Category	Retention Period	Legal Basis	Disposal Method
Training & student records	7 years	NDPA s.26; ITF Act	Secure deletion / shredding
Employee & HR records	7 years post-employment	CAMA 2020; PITA	Secure deletion / shredding
Unsuccessful job applications	12 months	Legitimate interests	Secure deletion
Financial & accounting records	7 years	Finance Act; CAMA 2020	Secure deletion / shredding
Marketing consent records	Until consent withdrawn	NDPA s.25(1)(a)	Deletion on withdrawal
Website cookies / analytics	Up to 13 months	GAID 2025, Art. 19	Automatic expiry / deletion
CCTV / security footage	30 days	Legitimate interests	Automatic overwrite

15. Security of Personal Data (NDPA 2023, Section 39)

The Group implements appropriate technical and organisational measures proportionate to the risk. These include:

- Encryption of personal data in transit and at rest
- Role-based access controls and multi-factor authentication
- Regular security audits and vulnerability assessments
- Physical security controls at all training centres and project sites
- Mandatory data protection training for all staff with access to personal data
- Incident response and business continuity procedures

16. Personal Data Breach Management (NDPA 2023, Section 40)

In the event of a personal data breach:

- The DPO must be notified immediately upon discovery.
- A breach risk assessment will be completed within 24 hours.
- Where the breach is likely to result in risk to data subjects' rights, the NDPC will be notified within 72 hours of discovery, in accordance with NDPA Section 40.
- Where high risk to data subjects is identified, affected individuals will be notified without undue delay.
- All breaches — notifiable or otherwise — must be recorded in the Breach Register (HTG-DPC-BR-001).

17. Data Protection Officer (NDPA 2023, Section 32)

Honeytreat Group will designate a Data Protection Officer (DPO) responsible for monitoring compliance with this Policy and the NDPA, serving as the primary point of contact for the NDPC and for data subjects.

DPO Title	Data Protection Officer, Honeytreat Group
Email	
Postal Address	9a Bankole Street, Magodo phase 1, Lagos State, Nigeria
Telephone	
NDPC Registration	[To be inserted upon registration]

18. Cookies and Online Tracking (GAID 2025, Article 19)

Our website (www.honeytreatgrp.com) uses cookies in accordance with GAID 2025, Article 19:

- Strictly necessary cookies enabled without consent (security, session management, core functionality).
- Analytical, marketing, and preference cookies require explicit opt-in consent via our cookie consent banner.
- Cookie consent may be withdrawn at any time through the cookie preference centre on our website.

19. Data Protection Impact Assessments (NDPA 2023, Section 41)

A DPIA must be conducted before commencing any new processing activity likely to result in a high risk to the rights and freedoms of data subjects, including large-scale processing of sensitive data or systematic monitoring. Where residual high risk remains after mitigation measures, the NDPC must be consulted prior to processing. DPIA records are maintained in HTG-DPC-DPIA-001.

20. Policy Review and Update

This Policy will be reviewed:

- Annually, or following any material change to the Group's data processing activities;
- Following any amendment to the NDPA, GAID, or other applicable Nigerian law;
- Following any significant data breach or regulatory enforcement action;
- At the direction of the NDPC.

All revisions will be recorded in the Revision History table on the document control page. Previous versions will be archived and clearly marked as superseded. Users must ensure they are consulting the current controlled version.

21. Contact and Regulatory Complaints

21.1 Contact the Group

- Email: legal@honeytreatgrp.com
- DPO Email: [to be inderted]
- Phone: 08079378912 / 08051866667

21.2 Contact the NDPC

If you are not satisfied with our response, you may lodge a complaint with the Nigeria Data Protection Commission:

- Website: ndpc.gov.ng
- Email: info@ndpc.gov.ng
- Lagos Office: No. 5 Idowu Taylor Street, Victoria Island, Lagos
- Abuja Office: Plot 2A, Aguiyi-Ironsi Street, Maitama, FCT Abuja