

The Pelican Lagos

Privacy Policy

The Pelican Apartment and Restaurant (The Pelican) is a leading hospitality services business that redefines the art of hospitality, blending luxury living and culinary excellence to create a haven unlike any other. Nestled in the vibrant heart of Lekki, The Pelican Lagos is more than just a place to stay; it's a sanctuary of style and comfort. Our short-let apartments, meticulously designed and fully serviced, offer a seamless fusion of elegance and convenience. ("about us"). The Pelican, as a data controller, takes its responsibilities with regard to the management of personal data very seriously and we do not take lightly the trust you have reposed in us, in providing us with your personal information. This Policy describes how The Pelican processes your Personal Data, but it may not address all possible data processing scenarios. This Privacy Policy is a guide to help you understand:

- (1) The Information We Collect
- (2) How We Collect and Use Your Data
- (3) Our legal basis for collecting your Data
- (4) Consent and Access Rights
- (5) Your Rights
- (6) Personal Data Protection Principles
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1. The Information We Collect

We collect the following information:

- first name, last name, gender, phone number, date of birth/age, address / postal address, email, country code, city, insurance company, marital status, biometric data, religion, medical, financial records or other beliefs, sexual orientation, health, race, ethnicity, political views, trades union membership,
- investigations' data such as anti-money laundering and Combating Financing of Terrorism checks, Enhanced Due Diligence, Fraud or Convicted Criminal database, Politically Exposed Persons, external intelligence reports, and other due diligence checks;
- any identifying number such as symbol, email address, physical address, telephone number, location information, online identifier, or other particular assignments to the Person, other information relevant which constitutes Personal Data or sensitive data. Your names and images (where aThe Pelicanicable);
- our preferences, such as consent for marketing and other communications; and
- other information relevant which constitutes Personal Data or sensitive data.

2. How We Collect and Use Your Data

2.1 The Pelican collects the above-mentioned information using forms, email, physical requests, and cookies.

2.2 When you send email or other communications to The Pelican, we may retain those communications in order to process your inquiries, respond to your requests and improve our services. When you access The Pelican's services, our servers automatically record information that your browser sends whenever you visit a website.

2.3 We use the above-mentioned information for research, regulatory compliance, marketing, business development, listing on industry directories, publicity, human resources management, recruitment, events planning and hosting, in-house security and analysis, key business operation, processing or carrying out tasks to fulfill business goals or objectives and purposes that are agreed with the data subject.

3. Our Legal Basis for Processing Your Data

3.1 The legal basis for processing your personal data is the legal requirement of your consent for us to process your personal data and our legitimate interest in providing our Services to you. We will process your personal information as stated above, if you give us your consent willingly or in accordance with the law. You give your consent to us through our products and services agreements.

3.2 We will only disclose your personal information if:

- the law requires it;

- we have a public duty to disclose the information;
- our or your legitimate interests require disclosure; or
- you agreed that we may disclose your information.

4. Consent and Access Rights

4.1 We require your consent for the processing of your data. We shall obtain your consent for individual matters, where any document deals with different matters.

4.2 If we intend to use your data for a purpose which is different from the purpose for which your data was obtained, we will seek your consent prior to the use of your data for that other purpose.

4.3 In the event of any merger, acquisition or another arrangement whereby The Pelican sells or transfers all, or a portion of its business or assets (including in the event of a reorganization, dissolution or liquidation) to third parties, you hereby consent that your personal data held with The Pelican can be transferred or assigned to third parties who may become the controllers and/or processors of your personal data that was held by The Pelican prior to such merger, acquisition or another arrangement. The Pelican shall at all times ensure that you are notified when your personal data is intended to be transferred to third parties in the circumstances outlined in this clause.

4.4 No consent shall be sought, given or accepted in any circumstance that may engender direct or indirect propagation of atrocities, hate, child rights violation, criminal acts, and anti-social conduct.

4.5 You may withdraw your consent, in writing, at any time and may request access to your personal information in our possession at compliance@parthian-partners-limited-b59db8.ingress-erytho.ewp.live. However, such withdrawal of consent shall not affect the lawfulness of the hitherto processing of your personal data before consent was withdrawn.

4.6 You reserve the right to request the modification or amendment of your personal data in our possession.

4.7 In all cases of access or modification/amendment of personal information, we shall request sufficient identification to enable us to confirm that you are the owner of the data sought to be accessed or modified/amended.

5. Your Rights

You have rights in relation to the way we handle your personal data. These rights include:

- a) where the legal basis of our processing is consent, to withdraw that consent at any time;

- b) to ask for access to the personal data that we hold;
- c) to prevent our use of personal data for direct marketing purposes;
- d) to object to our processing of personal data in limited circumstances; and
- e) to ask us to erase personal data without delay:
 - (i) if it is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
 - (ii) if the only legal basis of the processing is consent and that consent has been withdrawn and there is no other legal basis on which we can process that personal data;
 - (iii) if you object to our processing where the legal basis is the pursuit of a legitimate interest or the public interest and we can show no overriding legitimate grounds or interest; and
 - (iv) if the processing is unlawful.
- f) to ask us to rectify inaccurate data or to complete incomplete data;
- g) to restrict processing in specific circumstances e.g. where there is a complaint about accuracy;
- h) to ask us for a copy of the safeguards under which personal data is transferred outside of Nigeria;
- i) the right not to be subject to decisions based solely on automated processing, including profiling, except where necessary for entering into, or performing, a contract, with The Pelican; it is based on your explicit consent and is subject to safeguards; or is authorized by law and is also subject to safeguards;
- j) to prevent processing that is likely to cause damage or distress to you or anyone else;
- k) to data portability;
- l) to be notified of a personal data breach that is likely to result in a high risk to your rights and freedoms;
- m) to make a complaint to National Information Technology Development Agency or any other regulatory body; and
- n) in limited circumstances, receive or ask for your personal data to be transferred to a Third Party (e.g. another company with which you have dealing with) in a structured, commonly used, and machine-readable format.

6. Personal Data Protection Principles

When we process your personal data, we are guided by the following principles, which require personal data to be:

- a) processed lawfully, fairly, in a transparent manner, and with respect for the dignity of the human person.

- b) collected only for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
- c) adequate, relevant, and limited to what is necessary for relation to the purposes for which it is processed.
- d) accurate and where necessary kept up to date.
- e) removed or not kept in a form that permits identification of data subject for longer than is necessary for the purposes for which the personal data is processed.
- f) processed in a manner that ensures its security, using appropriate technical and organizational measures to protect against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

7. User Responsibility

You are required to familiarise yourself with this policy and to ensure that the information you provide to us is complete, accurate, and up to date.

8. Data Security

8.1 The Pelican implements and maintains appropriate safeguards to protect personal data, taking into account, in particular, the risks to you, presented by unauthorized or unlawful processing or accidental loss, destruction of, or damage to their personal data.

8.2 Safeguarding will include the use of encryption and pseudonymization where appropriate. It also includes protecting confidentiality (i.e. that only those who need to know and are authorized to use personal data have access to it), integrity, and availability of the personal data. We regularly evaluate and test the effectiveness of those safeguards to ensure the security of our processing of personal data.

8.3 You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures, we cannot guarantee absolute security. The Pelican, therefore, accepts no liability for any damage or loss, however, caused, in connection with transmission over the internet or electronic storage.

9. Links to third party sites

The Pelican website may contain links to other websites owned and operated by third parties. These links are provided for your information and convenience only

and are not an endorsement by The Pelican of the content of such linked websites or third parties.

The information collected from you may be accessible on the mentioned websites upon clicking the provided links. Please be aware that these linked websites are beyond our control and responsibility. The Pelican does not provide any warranties or representations, whether express or implied, regarding the safety of such linked websites, the third parties that own and operate them, or the suitability and quality of information contained within. It's important to note that this Privacy Policy does not grant The Pelican any authority over these websites. Therefore, if you choose to access these linked third-party websites or utilize the information available on them, you do so entirely at your own risk. The Pelican accepts no liability for any damage or loss, however, caused, in connection with the access, the use of, or reliance on any information, material, products, or services contained on or accessed through any such linked websites. We advise that you contact those websites directly for information on their privacy policy, security, data collection, and distribution policies.

10. Third-Party Access

10.1 The Pelican will only share personal information with other companies, entities or individuals in the following limited circumstances:

a) We have your consent.

b) We provide such information to other professional advisers or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.

c) We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (i) satisfy any applicable law, regulation, legal process or enforceable governmental request, (ii) enforce applicable terms of service, including investigation of potential violations thereof, (iii) detect, prevent, or otherwise address fraud, security or technical issues, or (iv) protect against imminent harm to the rights, property or safety of The Pelican, its users or the public as required or permitted by law.

10.2 The Pelican is at all times, responsible for the security and appropriate use of that data as long as it remains with The Pelican.

11. Monitoring of Electronic Communications

We communicate with you through different methods and channels. If allowed by law, we may record and monitor electronic communications to make sure that they comply with our legal and regulatory responsibilities and internal policies.

12. Monitoring and Analysis

We will monitor and analyze your account for credit, fraud, compliance, and other risk-related purposes as required by law.

13. Social Media

13.1 We operate and communicate through our designated channels, pages and accounts on some social media sites to inform, help and engage with our customers. We monitor and record comments and posts made about us on these channels so that we can improve our services.

13.2 The general public can access and read any information posted on these sites. We are not responsible for any information posted on those sites other than the information posted by our designated officials. We do not endorse the social media sites themselves, or any information posted on them by third parties or other users.

13.3 We do not give investment, tax, or other professional advice on social media sites. You should always get independent advice before making any decisions.

13.4 When you engage with us through social media your personal information may be processed by the site owner; this process is outside our control and may be in a country outside Nigeria that may have different privacy principles.

13.5 Social media sites are not appropriate forums to discuss our customers' products or financial arrangements. We will not ask you to share personal, account or security information on social media sites.

13.6 We regularly update and monitor our social media accounts and welcome feedback and ideas sent to us through these channels. We try to join conversations whenever possible but may not reply to all messages sent to official The Pelican social media accounts.

13.7 Emerging themes and helpful suggestions will be given to the relevant staff for consideration, but we cannot guarantee that any themes or suggestions will be acted on.

14 Transfer Across Borders

Sometimes, we will process your personal information in other countries, either to

carry out your instructions or for ordinary business purposes. Some countries may not have the same level of protection. If necessary, we will ask the party to whom we transfer your personal information to agree to our privacy principles, associated policies, and practices.

15 Violation of Privacy

15.1 We have put in place procedures to deal with any suspected personal data breach and will notify you of any personal data breach and let you know the steps we have taken to remedy the breach and the security measures we have taken at The Pelican to render your personal data unintelligible.

15.2 All suspected breaches of personal data will be remedied within 1 (one) month from the date of the report of the breach.

15.3 If you know or suspect that a personal data breach has occurred, you should immediately contact the The Pelican team at info@thepelicanlagos.com

15.4 The Pelican will not be responsible for any personal data breach which occurs as a result

of:

- a) an event that is beyond the control of The Pelican;
- b) an act or threats of terrorism;
- c) an act of God (such as but not limited to fires, explosions, earthquakes, drought, tidal waves, and floods) which compromises The Pelican's data protection measures;
- d) war, hostilities (whether war be declared or not), invasion, the act of foreign enemies, mobilization, requisition, or embargo;
- e) rebellion, revolution, insurrection, or military or usurped power, or civil war which compromises The Pelican's data protection measures;
- f) Pandemics or epidemics;
- g) the transfer of your personal data to a third party on your instructions; and
- h) the use of your personal data by a third party designated by you.

16 Data Retention

The Pelican shall retain and use your Personal Data only as long as is necessary to implement, administer and manage your request and contract with The Pelican and a maximum of 10 years after the expiration or termination of the contract or as required to comply with legal or regulatory obligations, including under tax and security laws. At your request, at any time, your Personal Data which is in the custody of The Pelican may be deleted unless we are required by law to retain

such information for a certain period of time so as to comply with our obligations under the law.

17 How to Contact Us

For any inquiries you have in relation to this Privacy Policy, please feel free to contact us at 2, Anga Close Lekki Enclave Road, Ikate, Lagos and apartment@thepelicanlagos.com

18. Governing Law

This Privacy Policy is made pursuant to the NDPR and other relevant Nigerian laws, regulations, or international conventions applicable to Nigeria. Where any provision of this Privacy Policy is deemed inconsistent with a law, regulation or convention, such provision shall be subject to the overriding law, regulation, or convention.