

POLICY DOCUMENT: **PRIVACY POLICY**

Odun Environmental Limited (ODUN)

Policy Owner: Head of Administration

Approval Authority: Managing Director / CISO

Version: 2.0

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1. INTRODUCTION

Welcome to Odun Environmental Limited ("Odun," "we," "us," or "our"). We are committed to protecting your privacy and ensuring the security of your personal information. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website [www.odunenvironmental.com] (the "Site"), engage our services, or otherwise interact with us.

Odun Environmental Limited is an integrated environmental, engineering, and energy solutions provider headquartered in Lagos, Nigeria, with operations extending across West Africa and strategic partnerships in the United Kingdom. We provide services including environmental studies, tank cleaning, integrated waste management, ESG advisory, renewable energy solutions, laboratory testing, pollution control, and safety studies.

By accessing our Site or using our services, you consent to the data practices described in this policy. If you do not agree with this Privacy Policy, please do not use our Site or engage our services.

2. INFORMATION WE COLLECT

2.1 Personal Information You Provide to Us

We may collect personal information that you voluntarily provide when you:

- **Inquire About Services:** Submit contact forms, request quotes, or schedule consultations (name, email, phone number, company name, job title, project details)
- **Engage Our Services:** Enter into contracts or statements of work (business contact information, billing details, project specifications)
- **Participate in Stakeholder Engagement:** Contribute to environmental impact assessments, community consultations, or ESG materiality assessments (name, affiliation, comments, feedback)
- **Apply for Employment:** Submit job applications or internship requests (CV, cover letter, qualifications, work history, references)
- **Subscribe to Communications:** Sign up for newsletters, reports, or event updates (email, preferences)
- **Interact on Social Media:** Engage with our content on LinkedIn, Twitter, Instagram, or other platforms (public profile information, comments)

2.2 Information Automatically Collected

When you visit our Site, we may automatically collect certain information about your device and browsing activity, including:

- **Device Information:** IP address, browser type, operating system, device identifiers
- **Usage Data:** Pages visited, time spent, links clicked, referral sources
- **Cookies and Tracking Technologies:** We use cookies, web beacons, and similar technologies to enhance user experience, analyze Site usage, and personalize content. You can manage cookie preferences through your browser settings.

2.3 Information from Third Parties

We may receive information about you from:

- **Business Partners:** Subcontractors, technology providers, or joint venture partners involved in project delivery
- **Public Sources:** Regulatory databases, professional networks (e.g., LinkedIn), or public company registries
- **Client Organizations:** When you are designated as a point of contact or project stakeholder by a client entity

2.4 Sensitive Information in Project Context

In the course of providing environmental and social services, we may process information that could be considered sensitive under certain frameworks, such as:

- Community demographic data collected during Social Impact Assessments
- Health and safety information related to site assessments or laboratory testing
- Environmental data that may indirectly reveal information about individuals or communities

Such information is collected solely for legitimate project purposes, with appropriate safeguards, and in compliance with applicable data protection laws and professional ethical standards.

3. HOW WE USE YOUR INFORMATION

We use the information we collect for legitimate business purposes, including:

3.1 Service Delivery & Project Execution

- Respond to inquiries, provide quotes, and manage client relationships
- Plan, execute, and report on environmental studies, tank cleaning, waste management, ESG advisory, renewable energy installations, and other contracted services
- Conduct stakeholder engagement, consultations, and grievance management as part of project requirements
- Perform laboratory testing, analysis, and reporting with accurate sample attribution
- Ensure health, safety, and environmental compliance during field operations

3.2 Business Operations & Improvement

- Administer our Site, troubleshoot technical issues, and enhance user experience
- Analyze usage trends to improve our services, content, and marketing
- Develop new service offerings and refine existing solutions
- Conduct internal training, quality assurance, and performance evaluation

3.3 Communications & Marketing

- Send service updates, project notifications, and administrative messages
- Share newsletters, industry insights, event invitations, and thought leadership content (with your consent where required)

- Respond to your comments, questions, and requests

3.4 Legal & Regulatory Compliance

- Comply with applicable laws, regulations, court orders, or governmental requests (e.g., NDPR, NMDPRA reporting requirements, AfDB safeguards)
- Establish, exercise, or defend legal claims
- Protect the rights, property, or safety of Odun, our clients, employees, or the public

3.5 Employment & Recruitment

- Evaluate job applications, conduct interviews, and make hiring decisions
- Manage employee records, benefits, performance, and professional development
- Comply with labor laws and regulatory requirements

4. LEGAL BASIS FOR PROCESSING (GDPR/APPLICABLE FRAMEWORKS)

If you are located in the European Economic Area (EEA), United Kingdom, or other jurisdictions with similar data protection frameworks, the following legal bases apply:

- **Contractual Necessity:** Processing required to perform services under a contract with you or your organization
- **Legitimate Interests:** Processing necessary for our legitimate business interests (e.g., service improvement, security, marketing), provided your rights do not override these interests
- **Consent:** Processing based on your explicit consent (e.g., marketing communications), which you may withdraw at any time
- **Legal Obligation:** Processing required to comply with applicable laws or regulatory requirements
- **Vital Interests:** Processing necessary to protect someone's life (e.g., emergency response situations)

5. HOW WE SHARE YOUR INFORMATION

We do not sell your personal information. We may share your information in the following circumstances:

5.1 With Your Consent

- When you explicitly authorize disclosure to a third party (e.g., sharing project contacts with a subcontractor)

5.2 Service Providers & Partners

- **Subcontractors & Specialists:** Environmental scientists, engineers, laboratory analysts, field technicians, or technology providers engaged to deliver project components
- **Technology Vendors:** Cloud hosting, CRM, email marketing, analytics, or collaboration tools (subject to data processing agreements)
- **Professional Advisors:** Legal counsel, auditors, insurers, or consultants supporting our operations

5.3 Regulatory & Legal Requirements

- Government agencies, regulators, or law enforcement when required by law (e.g., NESREA, NUPRC, NMDPRA, NOSDRA, Data Protection Commission)
- Development Finance Institutions (e.g., AfDB, IFC, FMO) as required by project safeguards and reporting obligations

- Courts or tribunals in response to valid legal process

5.4 Business Transfers

- In connection with a merger, acquisition, sale of assets, or financing transaction, provided the recipient agrees to honor this Privacy Policy

5.5 Aggregated or De-identified Data

- We may share aggregated, anonymized, or de-identified information for research, industry reporting, or marketing purposes, provided it cannot reasonably be used to identify you

6. INTERNATIONAL DATA TRANSFERS

Odun Environmental Limited operates in Nigeria and maintains partnerships in the United Kingdom. Your information may be transferred to, stored, or processed in countries outside your jurisdiction.

We ensure appropriate safeguards for international transfers, including:

- Compliance with the Nigeria Data Protection Regulation (NDPR) 2023 and relevant cross-border transfer requirements
- Use of standard contractual clauses or other approved mechanisms for transfers to jurisdictions without adequacy decisions
- Technical and organizational measures to protect data during transmission and storage

7. DATA RETENTION

We retain personal information only as long as necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law:

Data Category	Typical Retention Period	Rationale
Client/Project Records	7–10 years after project completion	Contractual obligations, regulatory requirements, liability management
Laboratory Test Data	10+ years	Regulatory compliance (NESREA), quality assurance, potential re-analysis
Employment Records	7 years after employment ends	Labor law compliance, reference verification
Marketing Preferences	Until consent is withdrawn or 3 years of inactivity	Respect for user choices, data minimization
Website Analytics	26 months (aggregated)	Trend analysis, Site improvement
Job Applications	2 years (with consent)	Future opportunity consideration

We regularly review our retention schedules and securely delete or anonymize data that is no longer needed.

8. YOUR DATA PROTECTION RIGHTS

Depending on your location and applicable law, you may have the following rights regarding your personal information:

8.1 Rights Under NDPR (Nigeria) & Similar Frameworks

- **Right to Access:** Request confirmation of whether we process your data and obtain a copy
- **Right to Rectification:** Request correction of inaccurate or incomplete information
- **Right to Erasure ("Right to be Forgotten"):** Request deletion of your data under certain circumstances
- **Right to Restrict Processing:** Request limitation of how we use your data in specific situations
- **Right to Data Portability:** Receive your data in a structured, machine-readable format and transmit it to another controller
- **Right to Object:** Object to processing based on legitimate interests or direct marketing
- **Right to Withdraw Consent:** Withdraw previously given consent at any time (without affecting prior lawful processing)
- **Right to Lodge a Complaint:** File a complaint with the Nigeria Data Protection Commission (NDPC) or relevant supervisory authority

8.2 How to Exercise Your Rights

To exercise any of these rights, please contact us using the details in Section 12. We will respond within 30 days (or as required by applicable law) and may request verification of your identity to protect your privacy.

Note: Certain rights may be limited by legal obligations, contractual necessities, or legitimate business interests (e.g., we cannot delete project data required for regulatory compliance).

9. DATA SECURITY

We implement appropriate technical and organizational measures to protect your personal information against unauthorized access, alteration, disclosure, or destruction:

- **Technical Safeguards:** Encryption (in transit and at rest), secure authentication, firewalls, intrusion detection, regular security testing
- **Organizational Safeguards:** Access controls, staff training, confidentiality agreements, incident response procedures
- **Physical Safeguards:** Secure facilities, controlled access to laboratories and offices, safe storage of physical records

While we strive to protect your information, no method of electronic transmission or storage is 100% secure. We cannot guarantee absolute security, but we commit to prompt notification and remediation in the event of a data breach as required by law.

10. COOKIES & TRACKING TECHNOLOGIES

10.1 What Are Cookies?

Cookies are small text files stored on your device when you visit a website. They enable Site functionality, enhance user experience, and help us understand how our Site is used.

10.2 Types of Cookies We Use

Cookie Type	Purpose	Duration	Can You Opt Out?
Strictly Necessary	Enable core Site functions (login, security, accessibility)	Session or persistent	No (essential for Site operation)
Performance /Analytics	Analyze Site usage, measure traffic, improve performance	Persistent (up to 26 months)	Yes (via browser settings or cookie banner)
Functionality	Remember preferences (language, region), personalize content	Persistent (up to 12 months)	Yes
Marketing/ Targeting	Deliver relevant ads, measure campaign effectiveness, enable social sharing	Persistent (up to 13 months)	Yes

10.3 Managing Cookies

You can manage cookie preferences:

- **Cookie Banner:** Use the consent management tool on our Site to accept or reject non-essential cookies
- **Browser Settings:** Adjust your browser to block or delete cookies (note: this may limit Site functionality)
- **Third-Party Tools:** Use opt-out tools from advertising networks (e.g., Google Ads Settings, Network Advertising Initiative)

For more information about cookies, visit www.allaboutcookies.org.

11. CHILDREN'S PRIVACY

Our Site and services are not directed to individuals under the age of 18. We do not knowingly collect personal information from children. If you believe we have inadvertently collected information from a minor, please contact us immediately, and we will take steps to delete such information.

12. CONTACT INFORMATION & DATA PROTECTION OFFICER

For questions about this Privacy Policy, to exercise your data rights, or to report a concern, please contact:

Data Protection Officer / Privacy Team

Odun Environmental Limited
274A Kofo Abayomi Street, Victoria Island, Lagos, Nigeria]
E: privacy@odunenvironmental.com
T: +234 (0) 705 699 000

Nigeria Data Protection Commission (NDPC)

If you are unsatisfied with our response, you may lodge a complaint with:

Nigeria Data Protection Commission
No. 12 Dr. Clement Isong Street,
Asokoro, Abuja, Nigeria.
E: complaint@ndpc.gov.ng
W: www.ndpc.gov.ng

For UK/EU inquiries:

If you are located in the United Kingdom or European Economic Area, you may also contact the relevant supervisory authority (e.g., UK Information Commissioner's Office).

13. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy periodically to reflect changes in our practices, services, or legal requirements. When we do:

- We will revise the "Last Updated" date at the top of this policy
- For material changes, we will provide prominent notice via our Site, email, or other appropriate channels
- Your continued use of our Site or services after changes take effect constitutes acceptance of the updated policy

We encourage you to review this policy periodically for updates.

14. ADDITIONAL DISCLOSURES FOR SPECIFIC SERVICES

14.1 Environmental & Social Impact Assessments (ESIA)

- Stakeholder information collected during consultations is used solely for project assessment, reporting, and grievance management
- Community data is aggregated and anonymized in public reports to protect individual privacy
- Free, Prior, and Informed Consent (FPIC) protocols are followed where applicable

14.2 Laboratory Services

- Sample attribution data (client name, location, sample ID) is linked to test results for accuracy and traceability
- Sensitive environmental or health-related findings are shared only with authorized client representatives and regulators as required
- Laboratory data is retained per NESREA accreditation requirements and quality management protocols

14.3 Renewable Energy Installations

- Site assessment data (energy usage, property details) is used for system design and performance modeling
- Monitoring data from installed systems is used for optimization, maintenance, and reporting (with client consent)
- Energy usage data is not sold or shared with third parties for marketing purposes


14.4 ESG Advisory & Reporting

- Client ESG data is handled confidentially and used solely for agreed advisory, reporting, or compliance purposes
- Public sustainability reports are published only with client authorization and in accordance with agreed disclosure frameworks
- Benchmarking or anonymized insights may be used for thought leadership with client permission



This Privacy Policy is intended to be clear, comprehensive, and compliant. We welcome feedback on how we can improve our privacy practices.

15.0 Approval

Approved By: 

Name: Ayo Abiodun

Title: Managing Director

Date: 17/04/2026

Policy Owner: Head of Admin