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ZIDA Privacy Policy 2027

Zephyr Interior Design Academy (ZIDA): how we collect, use and protect personal data

Issued by: Zephyr Interior Design Academy Limited (RC 1813261)
Applies to: applicants and students from 1 January 2027
Law: Nigeria Data Protection Act 2023

13. PRIVACY POLICY

At ZIDA (Zephyr Interior Design Academy Limited, RC 1813261), we are committed to protecting your privacy and safeguarding your personal information. This Privacy Policy explains our practices regarding the collection, use, storage, sharing and protection of your personal data when you apply to ZIDA, enrol on any of our programs, attend classes in person at the Abuja Training Centre (ATC) or the PH Training Centre (PHTC), study online, or use the ZIDA Student Hub. ZIDA handles personal data in line with the Nigeria Data Protection Act 2023 (the "Act").

This Privacy Policy is section 13 of the ZIDA Policies and Procedures 2027 and is also published on its own for the registration link. The two texts are the same. Please read it carefully. If you do not understand any part of it, contact us using the details in 13.11 before you register.

13.0. Definitions and Interpretation

In this Privacy Policy, unless the context requires otherwise:

- **"Personal data"** means any information relating to an identified or identifiable natural person, as defined in the Act, including a name, photograph, contact details, identification number, location data or online identifier.
- **"Sensitive personal data"** has the meaning given in the Act and includes information about a person's health.
- **"Processing"** means any operation performed on personal data, whether or not by automated means, including collection, recording, organisation, storage, adaptation, retrieval, use, disclosure, sharing, restriction, erasure or destruction.
- **"Data controller"** means the person who decides the purposes for which, and the means by which, personal data is processed. For the purposes of this Privacy Policy, ZIDA is the data controller.
- **"Data processor"** or **"service provider"** means a person or organisation that processes personal data on ZIDA's behalf to help deliver classes or manage administration.
- **"Data subject"**, **"you"** and **"your"** mean the applicant or student whose personal data ZIDA processes. Where a parent or guardian gives consent for an applicant aged 16 or 17, references to "you" include the parent or guardian where the context requires.
- **"Personal data breach"** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.
- **"Student Hub"** means ZIDA's online student platform, accessed with a Student ID and private PIN.
- **"Commission"** means the Nigeria Data Protection Commission established under the Act.

Headings are for convenience only and do not affect interpretation. Words in the singular include the plural and the other way round. A reference to a law includes that law as amended, extended or replaced from time to time, and any regulations made under it.

13.1. Information We Collect

- We may collect personal information, such as your name, contact information, and demographic details when you enroll in our classes. This is the information you give us on the application and registration form and when you contact us.

- Information collected may include data related to your course progress, assignments, interactions with instructors and fellow students, and technical data related to your online activities, such as your use of the Student Hub.

- Depending on your program and how you deal with us, the personal data ZIDA processes falls into the following categories:

- **Identity and contact data:** your full name, date of birth, gender, photograph, address, email address, telephone number and emergency contact.
- **Application and registration data:** the program, centre and cohort you apply for, the registration form, your Student ID, and the record of your acceptance of the ZIDA Policies and Procedures.
- **Academic records:** assignments, project work, portfolios, test and examination results, transcripts, certificates and the compliance records kept for full-time students.
- **Attendance data:** your attendance as recorded in the facilitator's register for each class and module.
- **Financial data:** invoices, payments, receipts and outstanding balances, and the details of any sponsor who pays your fees.
- **Student Hub data:** your Student ID, sign-in records, the course materials you open and the settings you choose, including your publicity consent setting.
- **Communications:** messages, emails, complaints, feedback and survey responses you send us, and the messages we send you.
- **Publicity material:** photographs, videos and examples of your work, used only as described in 13.12.
- **Health and disability information:** doctor's certificates you submit for absence or supplementary examinations, and any disability you disclose so that ZIDA can make arrangements for you, as described in the School Rules and Regulation ZIDA 2027. This is sensitive personal data and is processed only for those purposes.
- **Parent or guardian data:** for applicants aged 16 or 17, the name, contact details and written consent of the parent or guardian (13.9).

- We collect most of this information directly from you. Some of it is created by ZIDA in the course of your studies, such as your results and attendance. Some may come from a sponsor who pays your fees, or from a placement host who assesses you on placement.

- Some information is needed to register you and to manage your studies, such as your name, contact details and payment records. If you do not provide it, ZIDA may not be able to register you or provide the service you have asked for.

13.2. How We Use Your Information:

- We use the collected information to provide you with access to our classes and to manage your enrollment, including your timetable, course materials, assessment, results and certification.

- Your information may be used to communicate with you, including sending course-related updates, announcements, and support.

- In particular, ZIDA uses personal data to:

- process your application and registration and confirm your place in a cohort;
- issue invoices and receipts, confirm payments and manage outstanding balances, including the holds and withholding of results described in the ZIDA Policies and Procedures 2027;
- give you access to the Student Hub and release course materials;
- record attendance, assess your work, issue results, transcripts and certificates, and confirm your qualification when asked;
- arrange site visits and industry placements, and support full-time students in securing placement hosts;
- make arrangements for students who disclose a disability or submit a doctor's certificate;
- handle complaints, appeals and disciplinary matters under ZIDA's rules and policies;
- keep the academic and financial records that the law requires;
- with your consent, feature you and your work in ZIDA publicity (13.12).

- **Lawful bases.** The Act requires ZIDA to have a lawful basis for each use of personal data. ZIDA relies on the following:

- **Performance of a contract:** to admit you, teach you, assess you, issue your results and certificate, and manage your fees, because these are part of the agreement you enter into when you register.
- **Legal obligation:** to keep financial and academic records required by Nigerian law, and to respond to lawful requests from public authorities.
- **Legitimate interests:** to keep attendance records, run a safe learning environment, protect course materials and improve teaching, where these interests are not overridden by your rights.
- **Consent:** for publicity, including Student of the Month, and for the consent of a parent or guardian for applicants aged 16 or 17.
- **Health information:** doctor's certificates and disability information are processed with your consent, which you give when you submit them, or as otherwise permitted by the Act.

13.3. Data Security:

- We implement industry-standard security measures to protect your personal information from unauthorized access, disclosure, alteration, and destruction.

- Access to your personal information is restricted to authorized personnel who require it to fulfill their duties related to the classes.

- The Student Hub is protected by your Student ID and a private PIN that you choose. You are responsible for keeping your PIN private. Course materials on the Student Hub are watermarked.

- **Personal data breaches.** If a personal data breach occurs, ZIDA will deal with it as the Act requires, including notifying the Commission and, where the Act requires, the data subjects affected.

13.4. Information Sharing:

- We do not sell, trade, or rent your personal information to third parties.

- Your data may be shared with trusted service providers who assist us in delivering the classes or managing administrative functions. These service providers are contractually bound to maintain the confidentiality and security of your data. They include the providers of ZIDA's email, document storage and Student Hub services.

- ZIDA may also share personal data, limited to what is needed, with:

- a sponsor or partner who pays your fees, on matters relating to your sponsored place;
- a placement host, for full-time students on industry placement;
- professional and accrediting bodies with which ZIDA works, where a student's details are required for onboarding or accreditation;
- regulators, courts and law enforcement agencies, where the law requires it.

- **International transfers.** Some of ZIDA's service providers store data on servers outside Nigeria. Where personal data is transferred outside Nigeria, ZIDA relies on the grounds and safeguards the Act provides for such transfers.

13.5. Cookies and Tracking Technologies:

- Our website may use cookies and similar tracking technologies to enhance your experience. You can adjust your browser settings to manage cookies.

- The Student Hub records sign-ins and the materials you open so that access can be managed. It saves display preferences, such as theme, on your own device only.

13.6. Third-Party Links:

- Our classes may contain links to third-party websites. We are not responsible for the privacy practices or content of these external sites. We recommend reviewing the privacy policies of any linked websites.

13.7. Data Retention:

- We retain your personal information for as long as necessary to provide our classes and fulfill the purposes outlined in this Privacy Policy. You can request the deletion of your data by contacting us.

- In applying this rule, ZIDA keeps:

- academic records, such as results, transcripts and certificates, for as long as ZIDA needs them to confirm a student's results and qualification;
- financial records for as long as Nigerian tax and company law requires;
- other personal data only for as long as it is needed for the purpose for which it was collected, or as the law requires.

- Where a request for deletion is made, ZIDA may keep data that the law requires it to keep, or that is needed to establish, exercise or defend a legal claim.

13.8. Your Rights:

- You have the right to access, update, or delete your personal information. You may also opt out of receiving promotional communications from us.

- Under the Nigeria Data Protection Act 2023, you may also withdraw your consent at any time, including your publicity consent (13.12), and complain to the Nigeria Data Protection Commission. Withdrawing consent does not affect processing that took place before the withdrawal.

- In summary, and subject to the conditions in the Act, you have the right:

- to be informed about how your personal data is processed, as set out in this Privacy Policy;
- to obtain confirmation of whether ZIDA processes your personal data, and a copy of it;
- to have inaccurate or incomplete personal data corrected;
- to have personal data erased where ZIDA no longer has a lawful basis to keep it;
- to restrict processing in the circumstances the Act provides;
- to receive personal data you have provided in a commonly used, machine-readable format, where the Act provides for it;
- to object to processing based on legitimate interests;
- to withdraw consent at any time, where processing is based on consent;
- the rights the Act provides in relation to decisions based solely on automated processing;
- to lodge a complaint with the Nigeria Data Protection Commission.

- To exercise your rights or for any privacy-related inquiries, please contact us at support@zida.com.ng. Please state which right you wish to exercise. ZIDA may ask you to confirm your identity before acting on a request, and will respond within the time the Act allows.

13.9. Children's Privacy:

- The minimum age to enrol at ZIDA is 16. Our classes are not intended for individuals under the age of 16. We do not knowingly collect information from children under 16.

- Under the Act, a person under 18 is a child. An applicant aged 16 or 17 may enrol only with the **written consent of a parent or guardian, given at registration**, stating the parent or guardian's name and contact details. The parent or guardian gives consent under this Privacy Policy on the applicant's behalf and may exercise the applicant's rights under 13.8 as the Act allows.

13.10. Changes to the Privacy Policy:

- We may update this Privacy Policy from time to time to reflect changes in our practices. Any updates will be posted on our website with a revised effective date. The version in force is the one published on the date the personal data is processed.

13.11. Contact Us:

- If you have questions or concerns about this Privacy Policy or our privacy practices, please contact us at support@zida.com.ng, call the ZIDA front desk on +234 913 685 5492, or write to the Abuja Training Centre or the PH Training Centre.

13.12. Publicity and Student of the Month:

- With your consent, ZIDA uses your name, photograph, program and work in its publicity, for example Student of the Month features, on its website, social media and printed material. You give this consent when you accept the ZIDA Policies and Procedures at registration.

- You may withdraw this consent at any time from the settings on the Student Hub or by emailing support@zida.com.ng. After withdrawal, ZIDA makes no new use of your name, photograph or work. Material published before the withdrawal is not affected.

- For an applicant aged 16 or 17, publicity consent is given by the parent or guardian as part of the consent in 13.9.

13.13. Governing Law and Relationship with the Policies and Procedures:

- This Privacy Policy is governed by the laws of the Federal Republic of Nigeria, including the Nigeria Data Protection Act 2023. Nothing in it limits any right you have under the Act.

- This Privacy Policy forms part of the ZIDA Policies and Procedures 2027. If there is any conflict between this Privacy Policy and another ZIDA document on the processing of personal data, this Privacy Policy prevails.

13.14. Complaints to the Commission:

- If you are not satisfied with how ZIDA has handled your personal data or responded to a request, you may lodge a complaint with the Nigeria Data Protection Commission. We would welcome the chance to address your concern first, so please contact us at support@zida.com.ng.

13.15. Your Responsibilities:

- Please help us keep your information accurate. Tell ZIDA promptly if your name, contact details or emergency contact change, by updating them on the Student Hub where that is possible or by emailing support@zida.com.ng.

- Keep your Student ID and PIN private and do not let any other person use your Student Hub access. If you believe someone else has used your access, tell us at once at support@zida.com.ng.

- Respect the privacy of others. Personal data about fellow students, facilitators or clients that you see in class, on site visits or on placement must be treated as confidential, as set out in section 2 of the ZIDA Policies and Procedures 2027.

By enrolling in our classes, you consent to the collection and use of your personal information as described in this Privacy Policy.

It is important to review this Privacy Policy periodically to stay informed about our data practices.