

# Privacy Policy for Stears Premium

## Table of Summary

Important information and who we are	2
The data we collect about you	3
How is your personal data collected?	3
How we use your personal data	4
Disclosures of your personal data	7
Data security	8
Data retention	9
Your legal rights	9
Disclaimer	10

# General

Welcome to the Stears privacy policy.

Stears respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

- **Purpose of this privacy policy**

This privacy policy aims to give you information on how Stears collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a subscription or other service from Stears.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

- **Controller**

Stears News Limited is the controller and responsible for your personal data (collectively referred to as “Stears”, “we”, “us” or “our” in this privacy policy).

We have appointed a Data Protection Officer (“DPO”) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

- **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact Abdul Abdulrahim in the following ways:

Full name of legal entity: Stears News Limited

Email address: [support@stearsng.com](mailto:support@stearsng.com)

Postal address: 37b Shakiru Anjorin Street, Off Admiralty Road, Lekki Phase 1, Lagos, Nigeria

Telephone number: +234 704 1503056

- **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 28th July 2020. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

- **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Basic personal details – such as name, title and date of birth;
- Personal contact details – such as home address, delivery address, home phone number, mobile phone number, and email address;
- Work details – such as job title, department, company name, company address, work email address and office phone number;
- Login details – such as username;
- Payment details – such as your bank account and payment card information.
- Technical details - such as your IP address, your login data, browser type and version, timezone setting and location, operating system and platform, and other technology on the devices you use to access this website
- Transaction details - such as information about payments to and from you and other details of products and services you have purchased from us
- Usage details - such as information about how you use our website, products and services
- Marketing and communication details - such as information about your preferences in receiving marketing from us and your communication preferences

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but will not directly

or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **special categories of personal data** about you (this includes details about your race or ethnicity, gender, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### ● If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with a subscription). In this case, we may have to cancel a product or service you have with us but we will do our best to notify you if this is the case at the time.

## 3. HOW IS YOUR DATA COLLECTED?

There are different ways that data might be collected from or about you on stearsng.com, including through:

- **Direct interactions:** When you give us your basic or personal details by filling in forms or by corresponding with us by post, phone, email or otherwise.
- When you apply for our products or services;
- When you create an account on our website;
- When you subscribe to our service;
- When you request marketing to be sent to you;
- When you enter a competition, promotion or survey; or
- When you give us feedback or contact us.
- **Automated technologies or interactions:** when you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this data by using cookies and other similar technologies.
- Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources including social media

We may also collect technical data from the following parties about or in relation to you such as:

- analytics providers including Google;
- search information providers such as Google;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Paystack [NAME] based [inside OR outside] the EU].
- analytics from social media channels such as likes, shares and posts.

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### ● **Purposes for which we will use your personal data**

We will only use your personal data for the purpose for which We collected it which may include the following:

- to register you as a new user.
- to process and deliver your subscription order.
- to manage your relationship with us;
- to recommend products or services which may be of interest to you;
- to help us identify and provide the type of service offerings in which you are most interested in;
- to enable us create the content most relevant to you and to generally improve our services;
- to make the stearsng.com and other Stears applications and platforms easier for you to use by not having to enter information more than once;
- to manage risk, or to detect, prevent, and/or remediate fraud or other potentially prohibited or illegal activities; and
- to send periodic emails and marketing materials regarding your interest in our products and services.

### ● **Opting out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

- **Cookies**

Stears and its service providers, advertisers, ad technology providers and advertising servers may place, view, and/or use “cookies”, web server logs, web beacons, pixels or other electronic technologies to collect statistical and other information about you and your use of our website. This information may include information about the IP address of your computer, browser type, language, operating system, your mobile device, device ID, geolocation data, the state or country from which you accessed our services, the webpages visited, the date and the time of a visit, the websites you visited immediately before and after visiting the our site, the number of links you click while on site, the functions you use on this site, the databases you view and the searches you request on this site, the types of articles you read, the data you save on or download from this site and the number of times you view an advertisement.

We may use the information collected for various reasons, including research, analysis, to better serve visitors to this site (such as by enabling log-in, providing access to certain sections of this site, providing customised content or customised advertisements), to compile aggregate and anonymous information about usage of this site and other websites, other statistics, etc. However, if you have deleted and disabled cookies, these uses will not be possible to the extent they are based on cookie information. To opt out of Google Analytics please click [here](#).

To assist us with the uses described in this Privacy Policy, information collected about you and your use of this site or other websites may be aggregated, analyzed or combined with personal or other information about you from other online or offline sources. If you prefer that we not combine non-personal information that has been collected, through cookies, about your use of this site or other websites with personal or other information about you, then please delete and disable cookies for each browser, on each computer you use to surf the Web.

To manage cookies, the help function on most browsers and mobile devices contains instructions on how to set your browser to notify you before accepting cookies, disable cookies entirely, or disable the collection of geo-location data. If you disable certain cookies or refuse to accept a request to place a cookie, it is possible that some parts of this site, such as certain areas you need to log in, will not function properly, and the advertising you receive when you visit this site may not be advertisements tailored to your interests.

- **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [support@stearsng.com](mailto:support@stearsng.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

- **Service providers** – We engage service providers who help to support our business and improve our products. These service providers include, for example, fulfilment providers for delivery of our digital content and marketing; organisers and sponsors of our events and organisations that host our sites or databases.
- **Advertisers** – We, and our advertising partners, may use cookies to collect personal information and serve you with advertisements that we believe are relevant to you and your interests.
- **Institutional customers** – If your subscription is provided under a team subscription or trial, we may provide our client with information about your activity on stearsng.com for the purposes of user management, licence administration, content suggestion and billing. We may also make online tools available to our client for these purposes. We may also provide current or prospective clients with activity information about individual subscribers who registered using that entity's email address.
- **Social media providers** – Information will be shared with social media platforms where you log in to stearsng.com via a social media account, or use components on stearsng.com provided by social media platforms (e.g. the “Share on Facebook” function). We may also share the information of our subscribers with social media partners for the following reasons:
  - To prevent existing subscribers from being targeted with subscription offerings on social media platforms;
  - To create lookalike audiences for the purposes of targeted advertising on social media platforms
  - To encourage users to get the most out of their subscription.

**Other users** – stearsng.com is publicly accessible and anyone around the world who accesses stearsng.com will be able to see anything you post, such as comments about an article.

**Other users** – stearsng.com is publicly accessible and anyone around the world who accesses stearsng.com will be able to see anything you post, such as comments about an article.

**Stears group** – We may share your information within the Stears group to provide our services and to better understand the relationship between our products.

**Legal processes and successors in title** – We may disclose your information to comply with applicable laws, court orders or other valid legal processes, and to enforce or apply our terms of use, any subscription agreement, or any of our other rights. We may transfer or disclose your personal information to any entity which takes over or acquires the editorial business. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy. We also share aggregated, non-identifiable information with third parties. Before sharing this information, we ensure that it cannot identify you as an individual. For

example, we regularly release information about the size and growth of our audiences. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

To prevent unauthorized access to your information, stearsng.com uses Transport Layer Security (SSL/TLS) to ensure secure transmission of your personal data. You should see the padlock symbol in your URL address bar once you are successfully logged into the platform. The URL address will also start with https:// depicting a secure Webpage.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Please note that you also have a significant role in protecting your information. No one can see or edit your personal information without knowing your username and password, so do not share these with others. However, as the internet is not a secure medium, we cannot guarantee that security breaches will never occur. Accordingly, we are not responsible for the matters, which include actions of hackers and other unauthorized third parties that breach our reasonable security procedure.

## **7. DATA RETENTION**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.



In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## 8. YOUR LEGAL RIGHTS

You have a right to:

- request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and check that we are lawfully processing it. Please note that a data subject access request will attract a fee;
- request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may ask you to verify the accuracy of the new data you provide to us;
- request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. If we were not able to comply with your request of erasure for specific legal reasons, you will be notified, if applicable, at the time of your request;
- object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms;
- object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- request the transfer of your personal data to you or to a third party. We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Please note that this request may also attract a fee;
- withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

- **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

- **Time limit to respond**

We try to respond to all legitimate requests within 60 days. Occasionally it could take us longer than 60 days if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **DISCLAIMER**

By this Policy we do not represent or warrant the condition or functionality of stearsng.com, its suitability for use, nor guarantee that stearsng.com will be free from interruption or any error. No liability or responsibility shall lie for risks associated with the use of stearsng.com, including but not limited to any risk to your computer, software or data being damaged by any virus, software, or any other file that might be transmitted or activated via stearsng.com or your access to it. Neither do we guarantee the reliability of information contained on stearsng.com —particularly those shared by third party users.