Denny Social Welfare Hub

"Impacting lives for a better society"

Incorporated Trustees | CAC/IT/NO 147826

Data Protection and Privacy Policy

How We Collect, Use and Protect Your Personal Data

Document Title	Data Protection and Privacy Policy
Organisation	DENNY SOCIAL WELFARE HUB (DSWHUB)
CAC Registration	CAC/IT/NO 147826
Version	2.0
Effective Date	1 January 2026
Next Review Date	1 January 2028
Approved By	Board of Trustees
Owner	Executive Director / Secretary to the Trustees

Our Commitment

DENNY SOCIAL WELFARE HUB is committed to protecting the privacy of beneficiaries, donors, staff, volunteers and members of the public. This Privacy Policy explains what personal data we collect, why, how we use it, who we share it with, and your rights in line with the Nigeria Data Protection Act 2023 (NDPA) and the Nigeria Data Protection Regulation 2019 (NDPR).

Who We Are (Data Controller)

Denny Social Welfare Hub — Incorporated Trustees	
CAC NO.	CAC/IT/NO 147826
ADDRESS	4, Alimosho Road, Off Lagos-Abeokuta Expressway, by Pako Bus Stop, Iyana Ipaja, Lagos, Nigeria
TELEPHONE	+234 903 924 2821
EMAIL	info@dswhub.org
WEBSITE	https://dswhub.org
DPO	Reach our Data Protection Officer at info@dswhub.org

What Personal Data We Collect

Beneficiaries

- Name, age, sex, contact details, address, household composition;
- Identification (NIN, voter's card, BVN where lawful and necessary);
- Vulnerability assessment data and programme records;
- For children: data of the child and the parent or guardian;
- For survivors of violence and trafficking returnees: sensitive case information;
- For legal-aid clients: case information protected by lawyer-client privilege;
- Photographs and stories — only with documented consent.

Donors and Supporters

- Name, contact details, donation history, communication preferences;
- Tax-relevant information where applicable.

Staff, Volunteers and Job Applicants

- Identification, qualifications, references, banking details, statutory contributions;
- Background and safeguarding screening data.

Website Visitors

- IP address, browser, device, pages visited (via cookies and analytics);
- Information you submit through forms (contact, feedback, donations).

Why We Collect It (Lawful Bases)

We process personal data on one or more of the following lawful bases under the NDPA:

- Consent — when you give it freely;
- Performance of a contract for example, employment;
- Legal obligation — tax, audit, court order;
- Vital interests — to protect life or safety;
- Public interest — delivery of charitable programmes;
- Legitimate interests — balanced against your rights.

Sensitive data and children's data are processed only with explicit consent or another permitted basis with enhanced safeguards.

Your Rights

Under the NDPA, you have the right to:

- Be informed about our use of your data;
- Access your data and obtain a copy;
- Have inaccurate or incomplete data rectified;
- Have your data erased, subject to legal retention requirements;
- Restrict or object to processing;
- Request data portability where applicable;
- Withdraw consent at any time;
- Lodge a complaint with the Nigeria Data Protection Commission (NDPC) or with us directly.

> To exercise any right, contact us at info@dswhub.org. We respond within 30 days.

How We Protect Your Data

- Strong passwords and multi-factor authentication on accounts;
- Device encryption where supported;
- Cloud services chosen with security and contractual data-protection terms;
- Sensitive data sent only via encrypted channels;
- Paper records stored in lockable cabinets, in a lockable office;
- Role-based access controls with logs;
- Regular backups, securely stored;
- Secure disposal of devices and paper records.

Sharing Your Data

We share personal data only on a lawful basis and only as needed:

- Service providers (e.g., bankers, auditors, IT vendors) — under written data-processing agreements;
- Donors and partners — only the data needed for monitoring and reporting, with appropriate agreements;
- Authorities — where required by law (e.g., FIRS, NAPTIP, courts);
- Cross-border transfers — only where there is adequate protection or appropriate safeguards under the NDPA.

> We never sell your personal data.

How Long We Keep Your Data

- Beneficiary records: typically 7 years after end of services; safeguarding records minimum 7 years or until the child reaches age 25, whichever is later;
- Donor records: 7 years from last donation;

- HR records: duration of employment plus 7 years;
- Financial records: 7 years (CAMA / FIRS);
- Website analytics: typically 26 months.

Cookies and Analytics

Our website uses essential cookies for functionality and may use analytics cookies to understand how visitors use the site. You can disable cookies in your browser settings, though some features may not work as a result.

Data Breaches

If we become aware of a breach likely to result in a risk to your rights, we will notify the NDPC within 72 hours and inform affected individuals without undue delay where the risk is high.

Children's Data

We collect children's data only with parental or guardian consent, plus the child's age-appropriate assent. Children's data is treated as sensitive and stored under restricted access. See also our Child Safeguarding Policy.

Changes to This Policy

We review this policy every two years, or sooner if law, regulator guidance or donor requirements change. The current version is 1.0, effective 1 January 2026, with next review due 1 January 2028.

Contact Us

If you have any questions about this policy or anything else, please get in touch.

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