

NATIONAL YOUTH SERVICE CORPS (NYSC) DATA PRIVACY POLICY

PREAMBLE: DATA PRIVACY NOTICE

The **National Youth Service Corps (NYSC)** was established to amongst others; inculcate in the Nigerian youth the spirit of selfless service to the nation, ensure the development of common ties and promote national unity and integration, promote the spirit of self-reliance, offer vocational training and mentorship to Corps Members on productive ventures that accelerate the growth of the national economy. In order to achieve the above mandate, the NYSC ensures the equitable distribution and effective utilization of the skills of Corps Members in areas of national need.

In fulfilling this mandate, **NYSC collects, processes, and stores personal data of Corps Members, employees, and other stakeholders** in compliance with the **Nigeria Data Protection Act (NDPA) 2023** and other applicable data protection laws. This **Data Privacy Policy** outlines our commitment to ensuring the security, confidentiality, and lawful processing of personal data.

WHERE-OF

A. This Privacy Policy is established in compliance with **Section 37 of the Constitution of the Federal Republic of Nigeria (CFRN) 1999 (as amended), the Nigeria Data Protection Act (NDPA) 2023**, and all other applicable data privacy legislation.

B. It sets out how **NYSC** applies and complies with data privacy principles in processing the personal data of:

- I. Corps members,
- II. Staff,
- III. Facilitators,
- IV. Visitors, and
- V. Third parties that interact with **NYSC's website, social media accounts, and digital platforms.**

C. For personal data of individuals, this policy outlines their **data protection rights** and applies to all **data subjects whose personal data is collected and processed** in compliance with the NDPA.

D. Data Protection Officer (DPO) and Employee Responsibilities:

- The **NYSC Data Protection Officer (DPO)** is responsible for ensuring that this policy remains accurate, up to date, and is implemented effectively.
- The **DPO ensures that data subjects are duly notified** before the collection and processing of their personal data, including data collected via the **NYSC website and digital platforms**.
- **All NYSC employees who handle personal data** must comply with the provisions outlined in this policy.

PART 1: OUR COMMITMENT TO DATA PROCESSING PRINCIPLES

NYSC is committed to **processing personal data** in compliance with the **Nigeria Data Protection Act, 2023 (NDPA)** and other applicable laws. We uphold the following data protection principles outlined in **Section 24 of the NDPA** to ensure responsible and lawful data processing:

1.1 Key Principles of Data Processing

i. Fairness, Lawfulness, and Transparency:

- We will **always** obtain **your consent** or rely on another **lawful basis** before processing your data.
- We will be **transparent** about the **purposes of data collection and usage**.

ii. Purpose Limitation:

- We will **only collect and process personal data** for **specified, explicit, and legitimate purposes** as communicated to you.
- We will **not use** your data for **any other purpose** without your consent.

iii. Data Minimization:

- We will **limit** data collection to **only what is necessary** for the intended purpose.

iv. Accuracy and Updates:

- We will take **reasonable steps** to ensure **your data is accurate** and, where necessary, **kept up to date**.

v. Data Security and Confidentiality:

- We will implement **robust security measures** to protect your data from **unauthorized access, disclosure, alteration, or destruction**.

1.2 Beyond Compliance: Accountability and the Data Protection Triad

At NYSC, we go beyond legal compliance to demonstrate **accountability** in our data processing practices. We adhere to the **Data Protection Triad** to ensure:

- **Confidentiality:** Your personal data is protected from unauthorized access.
- **Integrity:** Your data remains accurate and reliable.
- **Availability:** Your data is accessible when required for legitimate purposes.

By maintaining these principles, we **uphold your rights, protect your privacy, and ensure responsible data processing.**

PART 2: CONSENT OF DATA SUBJECT

At NYSC, we respect your fundamental right to control how your **personal data** is collected, used, and processed.

2.1 Your Right to Consent

- **Your consent is our primary legal basis** for processing your personal data, **unless another lawful basis applies** under the Nigeria Data Protection Act (NDPA) 2023.
- You have the **right to grant, withhold, or withdraw your consent** at any time.

2.2 Withdrawing Consent

- You can **withdraw your consent** at any time by contacting **our Data Protection Officer (DPO)** (See **Part 20** for contact details).
- If you withdraw consent, we will **stop processing your data**, unless there is a **legal or regulatory requirement** to continue.

2.3 Legal Basis for Processing Without Consent

In certain cases, NYSC may process personal data without explicit consent, as permitted under the NDPA. These include:

- i. **Legal Obligation:** Where processing is necessary to comply with **legal or regulatory requirements**.
- ii. **Public Interest:** Where processing is required for a **task carried out in the public interest** or in the exercise of official authority.

- iii. **Contractual Necessity:** Where processing is needed to **perform a contract**, you are a party to.
- iv. **Vital Interests:** Where processing is necessary to **protect the life or safety** of the data subject or another individual.

For further details on your consent rights, please refer to **Sections 26, 34, 36, and 38 of the Nigeria Data Protection Act (NDPA) 2023.**

PART 3: OUR SCOPE OF DATA PROCESSING

3.1 Categories of Data

The table below outlines the different categories of **personal data** we collect, the **purposes** for which we collect it, and the **lawful basis** for processing that data. Please note that this list is **not exhaustive**, and all data collection complies with the **Nigeria Data Protection Act (NDPA) 2023**, while respecting your privacy rights.

Table 3.1: Categories of Data Collection

S/N	Purpose of Collection	Type of Data	Lawful Basis
1	Registration, Deployment, Redeployment, and Attendance	Full name, phone number, email, contact address, gender, date of birth, and academic records	Legal Obligation / Consent (Some instances may involve public interest while some may require consent as prescribed by the NDPA)
2	Assessment and Evaluation of Prospective Corps Members	Qualifications, educational background, referee details, next of kin details (full name, phone number, email, contact address, gender, date of birth, school records)	Legal Obligation / Public Interest / Consent
3	Financial Data	Bank account information, bank statements, Bank Verification Number (BVN), credit history, debit or credit card details, account number	Legal Obligation / Consent / Contract (Some instances may involve public interest while some may require consent)
4	Management of Infrastructure Development and Maintenance	Personal data of contractors, engineers, and construction workers involved in infrastructure projects	Contract (Some instances may involve other lawful bases such as consent, vital interest, or legal obligation)
5	Notifications, Data Analytics, Employment, Contract, and Security	Full name, phone number, email, contact address, medical records, referees, educational records, gender, date of birth, video recordings/still images from CCTV cameras, passport photograph, and similar data	Legal Obligation / Public Interest / Legitimate Interest

6	Technical Use	Internet Protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system, and platform used to access NYSC websites and services	Legitimate Interest
7	Data Usage	Information about how you use our website and services	Legitimate Interest
8	Profile Data	Your preferences in receiving publications from NYSC and our third-party partners, as well as your communication preferences	Consent / Legitimate Interest

3.2 Purpose of Data Collection

NYSC collects personal data for the following key purposes:

i. Registration, Deployment, and Redeployment

- Collecting data enables NYSC to register **prospective Corps members**, verify eligibility, and deploy them to different locations across **Nigeria** for their service year.

ii. Placement and Posting

- Personal data is used to **determine appropriate placement and posting** of Corps members to organizations, institutions, or sectors where their skills and qualifications are needed.

iii. Personal Information Management

- NYSC manages personal details such as **contact information, educational background, and medical records** to ensure proper communication and welfare support.

iv. Health and Safety

- **Health-related data** helps NYSC assess the **health status** of Corps members, provide necessary **medical services**, and respond **promptly to emergencies** during service.

v. Attendance and Reporting

- Data is used to **track attendance**, monitor participation in **NYSC activities**, and generate reports for **internal and governmental agencies**.

vi. Authentication and Fraud Prevention

- By collecting **photographs, fingerprints, and biometric data**, NYSC can **verify the identity** of Corps members, prevent **fraudulent enrollment**, and ensure **only eligible individuals** participate in the program.

vii. Welfare Services

- **Demographic data** helps NYSC develop **welfare programs**, including **accommodation, allowances, insurance, and financial assistance** for Corps members.

viii. Evaluation and Feedback

- **Data analysis** enables NYSC to **evaluate the effectiveness** of its programs, **gather feedback**, and improve future service operations.

ix. Statistical Analysis and Research

- Aggregated data supports **research into youth development trends, socio-economic factors, and the long-term impact of national service on individuals and communities.**

x. Compliance with Legal and Regulatory Requirements

- Ensuring compliance with relevant laws and policies, such as:
 - i. Nigeria Data Protection Act 2023 (NDPA)
 - ii. National Health Insurance Authority Act 2021
 - iii. Pension Reform Act 2014
 - iv. Other applicable legislation

xi. Responding to Data Subject Access Requests

- Data is processed to enable NYSC to **respond to Data Subject Access Requests (DSARs)**, ensuring transparency and compliance with the **NDPA 2023.**

xii. Alumni Engagement and Post-Service Tracking

- NYSC **maintains a database** of past Corps members to facilitate **alumni engagement, networking opportunities**, and research on the **impact of the NYSC program** on career development.

PART 4: DATA SUBJECT RIGHTS

NYSC is committed to **protecting your data privacy rights** and ensuring compliance with the **Nigeria Data Protection Act (NDPA) 2023**. As a **data subject**, you have **specific rights** under Sections 34 and 35 of the NDPA.

4.1 Your Rights Under the NDPA

You have the right to:

i. Right to Access

- You may request a **copy of the personal data** we hold about you.
- NYSC will provide this information in a **structured, accessible format**, subject to verification of identity.

ii. Right to Rectification

- If you believe any **personal data**, we hold about you is **inaccurate or incomplete**, you can request **corrections or updates**.
- We will **verify and process your request** within a **reasonable timeframe** in accordance with the NDPA.

iii. Right to Object

- You have the right to **object to the processing** of your personal data under specific circumstances, such as when:
 - The processing is based on **legitimate interest**.
 - You do not wish to receive **direct marketing communications**.
- You can also request that NYSC **restrict the way we use your personal information** in certain situations.

iv. Right to Data Portability

- You can request a **copy of your personal data** in a format that allows for easy transfer to another service provider.
- This applies when:
 - The data is processed **based on your consent**.
 - The data is processed **by automated means**.

v. Right to Restrict Processing

- You have the right to **request the restriction of processing** in cases where:
 - You contest the accuracy of your personal data.
 - The processing is unlawful, but you oppose **data erasure**.
 - You require the data for **legal claims** even though NYSC **no longer needs it**.

vi. Right to Object to Automated Decision-Making

- You have the right to object to **automated decision-making and profiling** that significantly affects you.
- You can request **human intervention** if an important decision **about your deployment, placement, or eligibility** was made solely by an automated process.

vii. Right to Withdraw Consent

- Where processing is **based on your consent**, you **may withdraw consent at any time**.
- Withdrawing consent **will not affect the lawfulness** of any prior processing based on consent before withdrawal.

4.2 Exercising Your Rights

To **exercise any of your rights**, you can submit a **Data Subject Access Request (DSAR)** through the NYSC Data Protection Officer (DPO).

- **Email:** dataprotection@nysc.gov.ng
- **Response Time:** NYSC will respond within **30 days** of receiving a verified request.
- **Exceptions:** Some requests may be denied if they **conflict with legal or regulatory obligations**.

For **detailed information** on your rights and the **complaint process**, please refer to **Part VI of the NDPA**.

PART 5: DATA RETENTION AND SECURITY

5.1 Commitment to Data Protection

NYSC is committed to safeguarding your personal data in compliance with the Nigeria Data Protection Act (NDPA) 2023. We implement appropriate technical and organizational measures to ensure the:

- **Security:** Protection from unauthorized access, breaches, and misuse.
- **Integrity:** Ensuring data remains accurate, complete, and up to date.
- **Confidentiality:** Restricting access to only authorized personnel.
- **Availability:** Ensuring that your data is accessible when required.
- **Resilience:** Establishing mechanisms for data recovery and business continuity in the event of a breach or system failure.

5.2 Data Retention Periods

The retention period for your personal data depends on the purpose for which it was collected. NYSC ensures that we only collect and retain data that is:

- **Necessary:** We limit data collection to what is legally or operationally required to serve you.
- **Legitimate:** We process data for lawful and justified purposes in accordance with regulatory frameworks.

Our commitment to privacy aligns with the 1999 Constitution of the Federal Republic of Nigeria and International Human Rights Law.

The table below outlines NYSC's standard data retention periods. Please note that specific circumstances may require adjustments.

Table 5.1: NYSC Data Retention Schedule

S/N	TYPE OF DATA	RETENTION TIMELINE	JUSTIFICATION
1	Registration and Deployment	For the duration of service year , after which it will be securely anonymized .	To fulfill contractual obligations , ensure seamless service year operations , and meet legal or regulatory compliance .
2	Placement and Posting	Retained for the duration of service year and securely archived for historical records and verification purposes.	Ensures accurate records of placement locations and supports administrative reviews and research .
3	Personal Information Management	Retained for the duration of service year , after which non-essential data will be deleted, while core records will be archived for alumni engagement .	Supports identity verification , data subject rights , and alumni relations .
4	Health and Safety Records	Retained for 5 years , except where medical history is legally required for a longer duration.	To facilitate health services , safety management , and emergency responses .
5	Attendance and Reporting	Retained for the service year , then archived for compliance and audit purposes.	To fulfill public interest requirements , regulatory audits , and security assessments .
6	Authentication, Welfare Services, Evaluation & Feedback	Retained for the duration of service year , and securely deleted thereafter, except where necessary for legal, compliance, or alumni engagement .	To enhance user experience , fraud prevention , and compliance tracking .
7	Statistical Analysis, Compliance & Regulation, Alumni Engagement	Aggregated and anonymized data may be stored indefinitely for policy research and historical analysis.	Supports decision-making , program effectiveness analysis , and national development research .

5.3 Secure Data Disposal & Anonymization

When personal data is **no longer required** or **exceeds its retention period**, NYSC will:

1. **Securely delete or destroy** the data from all systems and records.
2. **Anonymize data** where required for **historical research and analytics**.
3. **Ensure compliance** with **data protection regulations** while maintaining your **privacy rights**.

For further information on NYSC's **data retention policies**, you may contact the **NYSC Data Protection Officer (DPO)**.

PART 6: MANDATORY DATA COLLECTION

6.1 Essential Data for NYSC Services

Certain types of personal data are **mandatory** for NYSC to fulfill:

- **Legal obligations**
- **Operational requirements**
- **Regulatory compliance**

Without these essential data, NYSC may be unable to provide the services you require.

6.2 Categories of Mandatory Data

The **mandatory data we collect** includes, but is not limited to:

1. Personal Identification Data

- i. Full Name
- ii. Date of Birth
- iii. Gender
- iv. National Identification Number (NIN)
- v. Contact Address
- vi. Passport Photograph

2. Academic & Professional Records

- i. University/Polytechnic Name
- ii. Course of Study
- iii. Graduation Year
- iv. Degree/Certificate Obtained

3. Deployment & Service Records

- i. State of Deployment
- ii. Place of Primary Assignment (PPA)
- iii. Local Government Area (LGA)

4. Financial Data (For Allowances & Stipends)

- i. Bank Account Details
- ii. Bank Verification Number (BVN)

5. Health & Security Information

- i. Medical Records (where necessary)
- ii. Emergency Contact Details
- iii. Fingerprint and Biometric Data (for identity verification)

6.3 Why We Collect Mandatory Data

The collection of mandatory personal data allows **NYSC** to:

- i. **Register and Deploy Corps Members** in line with national service requirements.
- ii. **Verify Identity and Prevent Fraud** through biometric validation.
Facilitate Stipend & Allowance Payments via a secure financial system.
- iii. **Ensure Safety & Medical Support** for Corps members in emergencies.
- iv. **Comply with Legal and Regulatory Requirements** under the **Nigeria Data Protection Act (NDPA) 2023**.

PART 7: TRANSFER OF DATA TO THIRD PARTIES

7.1 Third-Party Services and Data Sharing

NYSC may share personal data with **authorized third-party service providers** to support its operations. These third parties assist in providing:

- i. **Identity verification** and biometric validation services.
- ii. **Financial services** (stipend processing & bank transactions).
- iii. **Medical services** (health insurance & emergency care).
- iv. **Security & fraud prevention** measures.
- v. **Research and program evaluation** for improving **NYSC** initiatives.

These **third parties** will process personal data based on their own **lawful bases**, in line with the **Nigeria Data Protection Act (NDPA) 2023**.

PART 8: TECHNICAL INFORMATION AND COOKIES

8.1 Website Data Collection and Cookies

NYSC website collects **certain types of technical data** when users visit the site.

This includes:

- i. **IP Address** – Used for security monitoring and analytics.
- ii. **Device Information** – Browser type, operating system, and session duration.
- iii. **Browsing Data** – Pages visited, time spent on each page, and navigation patterns.

This data helps NYSC **enhance user experience**, ensure website security, and improve overall digital service delivery.

8.2 Cookies and Your Preferences

Cookies are **small text files** stored on your device (computer, tablet, or phone) when you visit a website.

They help in:

- i. **Remembering login details** for faster access.
- ii. **Storing user preferences** for a personalized experience.
- iii. **Analyzing user behavior** to optimize website content.
- iv. **Enhancing security** by detecting suspicious activities.

However, NYSC ensures **transparency and control** over the use of cookies.

Managing Cookies

You can **manage or disable cookies** in your browser settings.

However, **disabling cookies may affect website functionality**, including login access and personalized settings.

8.3 Our Commitment to Privacy

NYSC is **committed to protecting your privacy** and ensuring that cookies and tracking technologies:

- i. **Are NOT used to collect sensitive personal data** without consent.
- ii. **Are NOT shared with unauthorized third parties.**
- iii. **Comply with NDPA 2023 regulations** on digital privacy.

Users are encouraged to **review the website's cookie policy** to make informed choices about their digital interactions.

PART 9: PERSONAL DATA SECURITY AND INTEGRITY

9.1 Data Security and Regulatory Compliance

NYSC is committed to protecting your personal data by implementing robust security measures and adopting industry-leading technologies. We employ a **multi-layered security approach** to prevent unauthorized access, cyberattacks, data loss, or data corruption. Our security framework aligns with the requirements of the **Nigeria Data Protection Act, 2023 (NDPA)** and other applicable regulations.

9.2 Compliance with Legal Obligations

NYSC strictly adheres to the **NDPA 2023** by proactively implementing the following measures:

- i. Conducting **regular administrative reviews** and **Privacy Impact Assessments (PIAs)** to evaluate data security risks.
- ii. Providing **mandatory employee training** on data protection best practices and regulatory compliance.
- iii. Requiring **strict data security warranties** from third-party vendors and service providers handling personal data (where applicable).

9.3 Data Breach Notification

In compliance with **Sections 28, 39, and 40 of the NDPA**, NYSC will promptly **report any personal data breach** that poses a **high risk** to individuals' rights and freedoms to the **Nigerian Data Protection Commission (NDPC)** within **72 hours** of becoming aware of the incident. This ensures swift mitigation and necessary remedial action.

For further details on these legal requirements, please refer to the **Nigeria Data Protection Act, 2023**.

PART 10: JOB APPLICANTS

10.1 Application Information

When applying for a position at **NYSC**, you will be required to provide certain personal information, including:

- i. **Personal details** (e.g., name, contact information)
- ii. **Educational background** (e.g., academic qualifications, certifications)
- iii. **Employment history** (e.g., previous roles, work experience)
- iv. **Other relevant information** necessary for assessing your suitability for the role
- v. **Details of referees, next of kin, and guarantors**

Providing this information is essential for us to process your application.

10.2 Data Usage for Recruitment

NYSC uses the personal data you submit solely for recruitment purposes, including:

- i. **Evaluating your suitability for the position** by assessing your skills and experience against job requirements
- ii. **Tracking feedback and interactions** throughout the recruitment process

Additionally, we may analyze recruitment data to:

- i. Identify the most effective recruitment sources
- ii. Improve onboarding and training programs
- iii. Enhance interview and selection processes for better hiring decisions

10.3 Optional Communications and Data Sharing

With your explicit consent, we may:

- Use your contact details to share information about **NYSC** events and relevant publications
- Share your data with affiliated organizations and third-party service providers, such as:
 - i. Recruitment agencies
 - ii. Background check providers

- iii. IT system providers

These service providers may be located within or outside your country of residence. You have the right to withdraw your consent at any time by contacting us.

10.4 Data Retention

NYSC retains your application data for a maximum period of **six (6) months**, unless a longer retention period is required by law or for legitimate organizational purposes. After this period, your data will be securely deleted or anonymized.

10.5 Data Subject Rights and Contact

As a data subject, you have the right to:

- i. Request access to your personal data
- ii. Rectify inaccuracies in your data
- iii. Withdraw consent where applicable
- iv. Request the deletion of your data (subject to legal and regulatory obligations)

To exercise your data protection rights, please contact our **Data Protection Officer** at: dataprotection@nysc.gov.ng

PART 11: MAINTAINING ACCURATE INFORMATION

At NYSC, we are committed to maintaining accurate and up-to-date personal data. If your personal information changes during your engagement with NYSC, we encourage you to notify us promptly to ensure our records remain current.

You can update your information by contacting our **Data Protection Officer (DPO)** at: dataprotection@nysc.gov.ng

This process aligns with your **right to rectification** under the **Nigeria Data Protection Act, 2023 (NDPA)**, ensuring that any inaccuracies in your personal data are corrected without undue delay.

PART 12: CHILDREN'S PRIVACY

NYSC website and application are not intended for children under the age of 13. We do not knowingly collect, use, or store personal data from children under this age.

If we become aware that we have inadvertently collected personal data from a child under 13, we will take immediate steps to delete the information in compliance with applicable data protection laws.

For more details on **parental consent requirements** under the **Nigeria Data Protection Act (NDPA) 2023**, please refer to **Section 31**.

For further clarification, you may contact our **Data Protection Officer (DPO)** at: dataprotection@nysc.gov.ng

PART 13: CAVEAT ON WEBSITE LINKS

NYSC website may contain links to external websites operated by third parties. These links are provided **for your convenience only** and do not constitute an **endorsement** by NYSC of the content, products, or services offered on those external sites.

Please note that **NYSC's Privacy Policy applies only to our website**. We do not have control over third-party websites and their data handling practices. **We strongly encourage you to review the privacy policies of any external websites** you visit to understand how your personal data may be collected, used, and shared.

For any concerns regarding third-party links, please contact our **Data Protection Officer (DPO)** at: dataprotection@nysc.gov.ng

PART 14: TRANSFER TO THIRD PARTIES AND CROSS-BORDER DATA TRANSFERS

To effectively carry out our mandate, NYSC may engage third-party service providers located **within or outside Nigeria**. In such cases, NYSC will:

1. **Enter into a Data Processing Agreement (DPA)** with the third party to ensure compliance with applicable data protection laws.
2. **Obtain your consent** if the purpose of data processing was not initially stated at the time of collection.
3. **Ensure that the third party implements adequate security measures** to protect personal data from accidental or unauthorized access, use, disclosure, loss, or destruction.

Where personal data is transferred to third parties **outside Nigeria**, NYSC will ensure compliance with **global regulatory standards** before approving such transfers. This may include:

- i. Verifying that the recipient country has **adequate data protection laws** as recognized by the **Nigeria Data Protection Commission (NDPC)**.
- ii. Implementing **contractual safeguards** approved by the NDPC, ensuring the recipient provides adequate protection.
- iii. Relying on **approved Binding Corporate Rules (BCRs)** for international data transfers.

Examples of Third-Party Services

Personal data may be transferred for the purpose of:

- i. **Internet connectivity**
- ii. **Cloud storage**
- iii. **Data analytics**
- iv. **Data security**
- v. **Software development**

NYSC remains committed to ensuring that all cross-border data transfers adhere to the **Nigeria Data Protection Act (NDPA), 2023**. For more details, please refer to **PART VIII of the NDPA**.

For any inquiries regarding data transfers, please contact our **Data Protection Officer (DPO)** at: dataprotection@nysc.gov.ng

PART 15: DATA PROTECTION HELP DESK

NYSC has established a dedicated **Data Protection Help Desk** to promptly address your **requests, suggestions, and complaints** regarding data privacy.

Our **Data Protection Officer (DPO)** is responsible for ensuring compliance with data protection laws and responding to any concerns about your personal data. You can contact the DPO via: dataprotection@nysc.gov.ng

Our Data Protection Services Include:

Our DPO provides the following services to ensure compliance with **data protection regulations**:

1. **Regulatory Compliance & Data Breach Services** – Ensuring NYSC adheres to applicable data protection laws and managing any data breach incidents.
2. **Data Protection & Privacy Advisory** – Providing expert guidance on data privacy best practices.
3. **Capacity Building & Training** – Conducting awareness and training sessions on data protection and privacy.
4. **Data Regulations Contract Drafting & Advisory** – Assisting in drafting and reviewing contracts for compliance with data privacy laws.
5. **Privacy Breach Remediation & Support** – Developing and supporting remediation plans in case of data breaches.
6. **Information Privacy Audits** – Assessing compliance with data protection laws and internal policies.
7. **Privacy Breach Impact Assessment** – Evaluating the potential risks and impacts of data breaches.
8. **Due Diligence Investigations** – Conducting investigations to assess compliance risks in data processing activities.

For any inquiries or assistance regarding your personal data, please **contact our Data Protection Help Desk**.

PART 16: DATA DELETION

You have the right to request the deletion of your personal data at any time. NYSC will take reasonable steps to delete your personal data **upon request**, subject to any **legal or regulatory requirements**.

We have established **secure data deletion procedures** to ensure the complete and **irreversible** destruction of personal data that has **exceeded its retention period** or is **no longer necessary** for business purposes.

Our Data Deletion Process

We follow a structured process to securely delete personal data:

1. **Identification** – We regularly review our data storage systems to identify personal data that has reached the end of its designated retention period or is no longer required for legal or business purposes.
2. **Scheduling** – Data identified for deletion is added to a scheduled deletion list, taking into account legal retention requirements and potential risks.
3. **Overwriting** – Data scheduled for deletion is **overwritten** with random characters or patterns, rendering it **unreadable and irrecoverable**.
4. **Verification** – We verify that the deletion process has been successful and that the original data is no longer accessible.
5. **Audit Trail** – We maintain **an audit log** of all data deletion activities, including details such as:
 - Type of data deleted
 - Date of deletion
 - The individual responsible for the deletion

Requesting Data Deletion

In addition to **automated deletion processes**, you can request the deletion of your personal data through our **Data Subject Access Request (DSAR) Form**. We will take all **reasonable steps** to fulfill your request within a commercially reasonable timeframe, subject to applicable legal and regulatory obligations.

Exceptions to Data Deletion

In certain situations, we may be unable to **completely delete** your personal data. This includes cases where:

- i. **Legal Retention Requirements:** We are required by law to **retain your data** for a specified period.
- ii. **Legal Disputes & Enforcement:** The data is required to **resolve legal disputes** or enforce our **terms of service**.
- iii. **Anonymization:** The data has been **anonymized** and is no longer personally identifiable.

In such cases, we will **restrict processing** of your data to the extent necessary.

For data deletion requests or further inquiries, please contact our **Data Protection Officer (DPO)** at: dataprotection@nysc.gov.ng

PART 17: DATA SUBJECT ACCESS REQUEST (DSAR)

17.1 What is a Data Subject Access Request (DSAR)?

A **Data Subject Access Request (DSAR)** allows you to request access to the personal data that NYSC holds about you. This may include:

- Your **name, contact details, and demographics**
- Any other information that can directly or indirectly identify you

17.2 How to Submit a DSAR

You can submit a DSAR through the following methods:

1. **Email Submission:** Send an email to dataprotection@nysc.gov.ng , clearly specifying the information you are requesting.
2. **DSAR Form Submission:** Complete the **DSAR form** and email it to dataprotection@nysc.gov.ng

17.3 Verification Process

To protect your **privacy** and **ensure secure access** to your data, we may require additional verification. This process may include:

- Requesting identification documents (e.g., **driver's license, passport**).
- Verifying information associated with your **NYSC account or records**.

17.4 Response Timeline

We strive to **respond to your DSAR within 30 days** after successfully verifying your request. Our response will include:

- **Confirmation** of your request.
- The **requested data**, provided in a **clear, concise, and electronic format**.
- If applicable, an **explanation for any denied access**.

17.5 Reasons for Denying Access

In **rare instances**, we may be unable to provide the requested information. If so, we will explain the **reason for denial**, which may include:

- The request involves **sensitive or legally protected** information.
- Providing access would violate another **individual's privacy rights**.
- The requested data **no longer exists** or **cannot be retrieved**.

17.6 Fees for DSAR Processing

There is **no charge** for submitting a DSAR. However, NYSC may charge a **reasonable fee** for requests that are:

- **Excessively repetitive** or submitted too frequently.
- **Clearly unreasonable** or require disproportionate effort.
- **Duplicate requests** for the same information within a short timeframe.

For further inquiries regarding DSARs, please contact our **Data Protection Officer (DPO)** at: dataprotection@nysc.gov.ng

PART 18: REMEDIATION

NYSC is committed to **resolving any concerns** you may have regarding your **data privacy**.

We encourage you to report any **complaints, concerns, or inquiries** to our **Data Protection Officer (DPO)** via: dataprotection@nysc.gov.ng

18.1 Complaint Resolution Process

Our DPO team will:

1. **Acknowledge receipt** of your complaint or inquiry.
2. **Investigate the issue** and assess potential data protection risks.
3. **Provide a resolution** within **7 business days**, where possible.

18.2 Handling Complex Issues

For **more complex issues** that require additional time, we will:

- **Notify you promptly** of the extended timeline.
- **Provide regular updates** on the status of your complaint.
- **Take all necessary steps** to protect your rights and interests throughout the process.

We remain committed to **transparent and fair resolution practices** in line with the **Nigeria Data Protection Act (NDPA), 2023**.

If you believe your concern has not been **adequately addressed**, you may escalate your complaint to the **Nigeria Data Protection Commission (NDPC)**.

PART 19: ALTERATION OF PRIVACY POLICY

NYSC, as the **Data Controller**, reserves the right to update this **Privacy Policy** periodically.

These updates may be necessary to:

1. **Enhance data privacy rights** for our users.
2. **Align with evolving public interest considerations.**
3. **Comply with lawful directives** from the **Federal Government of Nigeria.**

19.1 Compliance with Legal Safeguards

Any revisions to this policy will be made in strict compliance with:

- The **Nigeria Data Protection Act (NDPA), 2023.**
- The **1999 Constitution of the Federal Republic of Nigeria.**

Where required by law, we will **notify affected individuals** of any **material changes** to this Privacy Policy. We encourage users to review this policy **regularly** to stay informed about how we protect their personal data.

For further inquiries, please contact our **Data Protection Officer (DPO)** at: dataprotection@nysc.gov.ng

PART 20: CONTACT INFORMATION

If a **Corps member, Vendor/Contractor, Customer, or Staff** has concerns about how NYSC or any of its **third parties** handle personal data—or if they are dissatisfied with the resolution of a prior complaint—they have the **right to lodge a complaint** with the appropriate authorities.

Below are the **official contact details**:

20.1 Supervisory Authority

Nigeria Data Protection Commission (NDPC)

No.12 Clement Isong Street, Asokoro, Abuja, Nigeria

Email: info@ndpc.gov.ng

20.2 Data Controller

National Youth Service Corps (NYSC)

Plot 416, Tigris Crescent, Off Aguiyi Ironsi Street, Maitama, Abuja, Nigeria.

Email: info@nysc.gov.ng

20.3 Data Protection Officer (DPO)

Email: dataprotection@nysc.gov.ng

If you have any **questions, complaints, or concerns** about your **data privacy**, please contact our **Data Protection Officer (DPO)** for prompt assistance.