



Privacy Policy

Data Protection & Privacy Rights

Effective Date: January 1, 2025

Last Updated: May 2025

Version 1.0

NDPR & PIPEDA Compliant



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This Privacy Policy governs how Scholarium, a product of Twenty97 IT Services Ltd, collects, uses, protects, and handles personal data belonging to institutions, staff, and students who use the platform. By accessing or using Scholarium, you confirm that you have read and agreed to the terms of this policy.

1. INTRODUCTION

Scholarium is an academic management platform developed and operated by Twenty97 IT Services Ltd, a technology company incorporated in Alberta, Canada, with operations in Nigeria. We are committed to protecting the privacy and security of all personal data entrusted to us by institutions, staff, and students who use our platform.

This Privacy Policy explains what data we collect, how we use it, how we protect it, and your rights regarding your personal information. It applies to all users of the Scholarium platform, including institutional administrators,

academic staff, support staff, and students.

By accessing or using Scholarium, you agree to the terms of this Privacy Policy. If you do not agree, please discontinue use of the platform immediately.

2. WHO WE ARE

Company Name	Twenty97 IT Services Ltd
Platform	Scholarium (scholarium.com)
Registered Office	Edmonton, Alberta, Canada
Nigeria Operations	Lagos, Nigeria
Privacy Email	privacy@scholarium.com
General Inquiries	info@twenty97.com
Data Protection Officer	info@twenty97.com

3. DATA WE COLLECT

3.1 Institutional Administrators & Staff

- Full name, job title, and department
- Official email address and phone number
- Login credentials (username and encrypted password)
- Role and access level within the platform
- Activity logs and system usage records
- IP address and device information at login

3.2 Students

- Full legal name, date of birth, and gender
- Passport photograph
- Home address and state of origin
- Next of kin details and emergency contact
- National Identification Number (NIN) where required
- Student identification number
- Academic records — enrolled courses, semester results, GPA, CGPA, and transcript history
- Fee payment records, receipts, and outstanding balances
- Transcript request history
- Login activity and portal usage logs

3.3 Prospective Students (Applicants)

- Full name, date of birth, and contact information
- Educational qualifications and supporting documents
- Application status and correspondence history

3.4 Institutional Data

- Institution name, address, and accreditation details
- Staff rosters and departmental structures
- Financial summaries and academic session records
- NMCN, NUC, or other regulatory body information

3.5 Technical Data

- Browser type and version
- Device type and operating system
- IP address and approximate geographic location
- Session duration and page interaction logs
- Error logs and platform performance data

4. HOW WE COLLECT YOUR DATA

We collect personal data through the following means:

- Direct input — data entered by administrators, staff, or students into the platform
- Bulk upload — Excel or CSV files uploaded by institutional administrators
- Payment processors — transaction data received from Paystack and Flutterwave upon successful payments
- Automatic collection — technical data collected automatically when you access the platform
- Third-party verification — identity verification services where applicable

5. HOW WE USE YOUR DATA

5.1 Platform Operations

- Creating and managing user accounts
- Processing student enrollment and academic records
- Generating and publishing examination results and transcripts
- Tracking fee payments and generating receipts
- Managing transcript requests and fulfillment
- Sending announcements and institutional notices

5.2 Compliance & Reporting

- Generating reports for the Nursing and Midwifery Council of Nigeria (NMCN)
- Supporting accreditation visits and regulatory inspections
- Maintaining academic records for the duration required by law

5.3 Platform Improvement

- Analyzing usage patterns to improve features and performance
- Diagnosing technical issues and resolving errors
- Developing new features based on institutional feedback

5.4 Communication

- Sending system notifications, alerts, and announcements
- Responding to support requests and inquiries
- Sending billing and subscription-related communications to institutions

5.5 Security

- Detecting and preventing unauthorized access
- Monitoring for suspicious activity and potential breaches
- Maintaining audit trails of all data access and modifications

6. LEGAL BASIS FOR PROCESSING

We process personal data under the following legal bases in accordance with the Nigeria Data Protection Regulation (NDPR) and applicable Canadian privacy legislation (PIPEDA):

- Contractual necessity — processing required to deliver the services agreed upon in the institutional subscription contract
- Legal obligation — processing required to comply with Nigerian educational regulatory requirements including NMCN and NUC mandates
- Legitimate interests — processing for platform security, fraud prevention, and service improvement
- Consent — where explicitly obtained, particularly for optional communications and marketing

7. DATA SHARING & DISCLOSURE

We do not sell, rent, or trade your personal data to any third party under any circumstances.

7.1 With Your Institution

Student data is accessible to authorized staff within your institution based on their assigned role and access level. Scholarium does not share student data across different institutions.

7.2 With Service Providers

We work with trusted third-party service providers who assist us in delivering the platform. These include:

- Paystack and Flutterwave — payment processing
- Amazon Web Services (AWS) — cloud hosting and data storage
- Email delivery services — for system notifications and receipts

All service providers are bound by data processing agreements and are prohibited from using your data for any purpose other than delivering their specific service.

7.3 With Regulatory Bodies

Where required by Nigerian law or court order, we may disclose information to regulatory bodies such as NMCN, NUC, or law enforcement agencies. We will notify affected institutions wherever legally permissible before making such disclosures.

7.4 Business Transfers

In the event of a merger, acquisition, or sale of Twenty97 IT Services Ltd, user data may be transferred to the successor entity. Affected institutions will be notified in advance and given the opportunity to request deletion of their data.

8. DATA STORAGE & RETENTION

8.1 Storage Location

All Scholarium data is stored on enterprise-grade cloud servers hosted by Amazon Web Services. Data is encrypted both in transit (SSL/TLS) and at rest (AES-256 encryption).

8.2 Retention Periods

Data Type	Retention Period
Active student academic records	Duration of enrollment + 10 years
Graduated student records	10 years (20 years on Business plan)
Payment and financial records	7 years (financial regulations)
Staff account data	Duration of employment + 2 years
Application data (unsuccessful)	1 year after application decision
Technical / system logs	12 months
Deleted account data	30 days before permanent deletion

8.3 Data Deletion

Upon termination of an institutional subscription, data will be retained for 90 days to allow for export and transition. After 90 days, all institutional data will be permanently and irreversibly deleted from our servers unless a retention extension has been agreed upon in writing.

9. DATA SECURITY

We take data security seriously and implement the following measures:

- Encryption — AES-256 encryption for all stored data; SSL/TLS encryption for all data in transit
- Access control — role-based access ensures staff only access data relevant to their function
- Authentication — secure password policies and session management

- Daily backups — automated daily backups stored in geographically separate locations
- Audit trails — all data access and modification events are logged with timestamps and user identifiers
- Penetration testing — regular security assessments of the platform
- Staff training — all Twenty97 staff with data access are trained in data protection practices

In the event of a data breach that poses a risk to your rights and freedoms, we will notify affected institutions within 72 hours of becoming aware of the breach, in accordance with GDPR requirements.

10. YOUR RIGHTS

10.1 Right of Access

You have the right to request a copy of all personal data we hold about you. Institutions may request a full data export at any time from within the platform.

10.2 Right to Rectification

You have the right to request correction of inaccurate or incomplete personal data. Staff and administrators may update most information directly within the platform.

10.3 Right to Erasure

You have the right to request deletion of your personal data where it is no longer necessary for the purposes for which it was collected, subject to our legal retention obligations.

10.4 Right to Restrict Processing

You have the right to request that we limit how we use your data in certain circumstances, such as while you contest its accuracy.

10.5 Right to Data Portability

Institutions have the right to receive their data in a structured, machine-readable format (CSV or Excel) for transfer to another system at any time.

10.6 Right to Object

You have the right to object to processing of your personal data for legitimate interests or direct marketing purposes.

10.7 Right to Withdraw Consent

Where processing is based on consent, you have the right to withdraw consent at any time without affecting the lawfulness of prior processing.

To exercise any of these rights, contact us at privacy@scholarium.com. We will respond to all requests within 30 days.

11. COOKIES & TRACKING

Scholarium uses essential cookies to maintain your login session and ensure the platform functions correctly. We do not use advertising cookies or tracking pixels.

Cookie Type	Purpose	Duration
Session cookie	Maintains your logged-in state	Until browser is closed
Security token	Prevents cross-site request forgery	24 hours
Preference cookie	Remembers display preferences	30 days

You may disable cookies in your browser settings, however doing so may prevent certain platform features from functioning correctly.

12. CHILDREN'S DATA

Scholarium is designed for use by tertiary educational institutions. We do not knowingly collect data from individuals under the age of 16 without verified institutional oversight. All student data on the platform is managed by the institution and subject to their own safeguarding policies. If you believe a minor's data has been collected inappropriately, contact us immediately at privacy@scholarium.com.

13. INTERNATIONAL DATA TRANSFERS

Twenty97 IT Services Ltd operates from Canada with services delivered to institutions primarily in Nigeria. Data may be processed in Canada, Nigeria, or on AWS infrastructure in compliance-appropriate regions. All international transfers are conducted under appropriate safeguards including standard contractual clauses and compliance with both GDPR and Canadian PIPEDA requirements.

14. THIRD-PARTY LINKS

The Scholarium platform may contain links to third-party websites such as payment processors or regulatory body portals. This Privacy Policy does not apply to those external sites. We encourage you to review the privacy policies of any third-party sites you visit.

15. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, legal requirements, or platform features. When we make material changes, we will notify institutional administrators by email and display a prominent notice within the platform at least 14 days before the changes take effect.

The most current version of this policy will always be available at scholarium.com/privacy-policy.

16. GOVERNING LAW

This Privacy Policy is governed by the Nigeria Data Protection Regulation (NDPR) issued by the National Information Technology Development Agency (NITDA), and where applicable, the Personal Information Protection and Electronic Documents Act (PIPEDA) of Canada.

17. CONTACT US

For any privacy-related questions, concerns, or requests, please contact:

Company	Twenty97 IT Services Ltd
Platform	Scholarium (scholarium.com)
Privacy Email	privacy@scholarium.com
General Inquiries	info@twenty97.com
Headquarters	Edmonton, Alberta, Canada
Nigeria Operations	Lagos, Nigeria
Response Time	Within 2 business days; 30 days for formal rights requests

This Privacy Policy was prepared by Twenty97 IT Services Ltd and is effective as of January 1, 2025. It complies with the Nigeria Data Protection Regulation (NDPR) and Canadian PIPEDA requirements.