



In partnership with

GATEWAY Program

Data Privacy and Protection Policy

February 10, 2026

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Last Updated DATE:	February 10, 2026

1. About GATEWAY, CcHUB and Our Role

The GATEWAY Program ("GATEWAY" or the "Program") is a large-scale skills development and employability initiative by the Mastercard Foundation and Co-creation HUB Limited (also known as CcHUB). The Program is designed to equip young people—particularly women and underserved youth—with digital, creative, and business management skills to access sustainable work opportunities in the digital and gig economy.

For the purposes of applicable data protection laws, including the Nigeria Data Protection Act 2023 (NDPA), and subsidiary regulations, and aligned global data protection principles, CcHUB Nigeria primarily acts as a **Data Controller**, as we determine the purpose and means of processing your personal data. In specific instances, particularly where we work with delivery partners, technology vendors, or funders, we may also act as a **Data Processor** on documented instructions.

This Privacy Policy applies to all Program participants, applicants, facilitators, training providers, partners, vendors, website visitors, and portal users.

2. Your Responsibilities

By engaging with the Program website, learning portal, or program activities, you agree to:

- Review and understand this Privacy Policy.
- Review any additional contractual documents or Program agreements, where applicable, as these may provide further detail on data processing activities.
- Ensure that any personal data you provide about another individual is done with their explicit consent and solely for legitimate Program-related purposes.
- Provide executed consent documents from individuals/entities that participate in Program-related activities.

Where you submit personal data on behalf of another person, you confirm that you are legally authorised to do so.

3. Personal Data We Collect

Depending on your interaction with the Program, we may collect the following categories of personal data:

- Full name
- Email address
- Phone number(s)
- Gender and age range (for program reporting and inclusion tracking)
- Location (state, country, region)
- Educational background and employment status
- Skills, learning preferences, and assessment outcomes

- Portfolio submissions and learning artefacts
- Login credentials and user activity data on the GATEWAY portal
- Information required for recruitment, facilitation, partnership, or funding compliance

We only collect data that is relevant, adequate, and necessary for clearly defined program purposes.

4. When We Collect Your Data

We may collect your personal data when you:

- Apply to the Program or any of its learning tracks
- Register on the GATEWAY website or learning portal
- Participate in assessments, surveys, or monitoring and evaluation activities
- Upload assignments, portfolios, or learning outputs
- Apply to serve as a facilitator, training provider, or partner
- Communicate with us via email, forms, chat tools, or social media
- Access or interact with the GATEWAY digital platforms.

5. How We Use Your Data

We process personal data strictly for legitimate program and operational purposes, including to:

- Assess eligibility and onboard participants, facilitators, and partners
- Deliver learning content, assessments, and certifications
- Monitor learning progress, completion, and outcomes
- Improve program design, user experience, and impact measurement
- Meet donor, regulatory, and audit reporting requirements (in aggregated or anonymised form)
- Communicate program updates, opportunities, and support information
- Maintain platform security, integrity, and performance.

6. Legal Basis for Processing

We process your personal data based on one or more of the following lawful bases:

- Your explicit consent
- Performance of a contract or program participation agreement
- Compliance with legal and regulatory obligations
- Legitimate interests related to program delivery, safeguarding, and improvement

7. Data Storage and Security

Personal data collected through the Program may be stored and processed using secure systems, including:

- Cloud-based learning management systems (LMS)
- Secure databases and analytics tools
- Encrypted laptops and smart devices
- Google Workspace and Microsoft Office 365
- Approved third-party platforms used for program delivery

We implement appropriate technical and organisational safeguards, including encryption, access controls, and two-factor authentication, to protect your data.

8. Data Retention

We retain personal data only for as long as is necessary to fulfil the purposes for which it was collected, subject to applicable legal and contractual obligations. For example:

- Program participation data may be retained for up to 7 years for reporting and audit purposes
- Recruitment and facilitator application data may be retained for up to 2 years
- Learning analytics and assessment records may be anonymised and retained for long-term impact analysis

You may request correction or deletion of your personal data at any time, subject to any applicable legal limitations.

9. Third-Party Service Providers

We do not sell or commercially share your personal data. However, we engage trusted third-party service providers to support program delivery and platform functionality, including:

- Learning management and assessment tools
- Analytics and performance monitoring tools
- Application and survey platforms
- Communication and chatbot services

All third-party processors are required to comply with applicable data protection laws and operate under appropriate data processing agreements.

10. Disclosure to Donors, Regulators and Authorities

We may disclose personal data to donors, government authorities or regulators where required to:

- Comply with applicable laws in Nigeria and other relevant jurisdictions
- Fulfil donor or statutory reporting obligations
- Protect the rights, safety, or property of program participants and partners
- Prevent or investigate fraud, misuse, or security incidents

Such disclosures are limited to what is strictly necessary.

11. Your Data Protection Rights

Under the NDPA, you have the right to:

- Access your personal data.
- Request correction or deletion of your data. The right to request deletion of your data is exercisable where:
 - (a) the data is no longer necessary for its original purpose of collection;
 - (b) the only legal basis of processing is consent and that consent has been withdrawn and there is no other legal basis on which we can process that personal data;
 - (c) you object to our processing of your data where the legal basis is the pursuit of a legitimate interest or public interest, and we can show no overriding legitimate grounds or interest;
- Object to or restrict data processing activities.
- Withdraw consent where processing is consent-based.
- Request data portability, where applicable, which entails:
 - (a) right to request and receive, without undue delay, a copy of your data in a structured, commonly used, and machine-readable format;

- (b) right to transmit your personal data obtained under (a) above to another data controller without any hindrance; and
- (c) right to request, where technically possible, for your personal data to be transmitted directly from us to another data controller.
- Lodge a complaint with the Nigeria Data Protection Commission (NDPC).
- Right to ask for the safeguards under which your personal data is transferred outside Nigeria.
- Right to prevent processing of your personal data that is likely to cause damage or distress to you or anyone else.
- Right to be notified of a personal data breach which is likely to result in a high risk to your rights and freedoms.

Requests may be subject to identity verification and reasonable administrative requirements.

12. Affiliate and Partner Communications

By participating in the Program, you may receive information about related opportunities, services, or initiatives from CcHUB, the Mastercard Foundation, and approved program partners. You may opt out of non-essential communications at any time.

13. Cookies and Platform Analytics

The GATEWAY website and portal use cookies and similar technologies to:

- Enable core platform functionality
- Improve performance and user experience
- Analyse usage trends and engagement

You may manage cookie preferences through your browser settings.

14. Data Breach Management

We maintain incident response and data breach management procedures aligned with applicable data protection laws. Where a data breach occurs that poses a risk to your rights and freedoms, we will notify relevant authorities and affected individuals within the legally required timeframe.

15. Contact and Data Protection Officer

For questions, requests, or concerns relating to this Privacy Policy or your personal data, please contact:

Data Protection Officer

Email: privacy@cchub.africa

You may also lodge complaints with the Nigeria Data Protection Commission via info@ndpc.gov.ng

Consent Statement

☐ I have read and understood the terms of the Privacy Policy, and I agree to the collection, use, and processing of my personal data as detailed in the policy.

Name: _____

Signature: _____

Name of organization: _____

Date: _____