



MEDICAL LABORATORY SCIENCE COUNCIL OF NIGERIA



MLSCN PRIVACY POLICY

MISSION STATEMENT

“Empowering excellence in laboratory services, the Medical Laboratory Science Council of Nigeria is committed to being the foremost government agency championing privacy standards. Our mission is to meticulously handle personal data in a relevant, timely, accurate, coherent, transparent and accessible manner by ensuring confidentiality and setting the highest standards for ethical practice.”

PURPOSE

The primary purpose of this policy is to ensure that high quality data are available to support managerial decisions within MLSCN and forms key strategy for aiding laboratory improvement, strengthening and setting high standards in medical laboratory science training.

SCOPE

The policy applies to all MLSCN websites and web services operated by MLSCN unless the website or service has a separate privacy policy, Since MLSCN individually operate these sites but share many of the same privacy practices, we will refer to them collectively as ‘MLSCN’ in this policy when describing practices that apply to both of them. All directorates and units of MLSCN with the responsibilities to have access to data are expected to collect, interpret, store and use it appropriately.

All data collected, used and reported by MLSCN including administrative, financial, client and human resource data are within the scope of this policy. If you have any comments or questions about this notice, feel free to contact us at dpt@mlscn.gov.ng

1. WE ARE COMMITTED TO PROTECTING YOUR PRIVACY

This Privacy Policy applies to the minimum amount of information collected about clients, practitioners, individuals, corporate organizations and tertiary institutions who interact with MLSCN and that is commensurate with the satisfactory services

provided. This policy explains the type of processes that may result in data that we collect and how we use it.

2. PERSONAL INFORMATION WE PROCESS

We have detailed in the table below the type of data we collect depending on the type of transaction you enter into, the legal basis under the Nigeria Data Protection Act on which this data is processed.

S/NO	PURPOSE	DATA (KEY ELEMENTS)	LEGAL BASIS
1	Indexing	Name, postal address, phone numbers, email. Name of school/institution, biodata	Public Interest - As part of our mandate to regulate the profession in institutions of learning. Legitimate Interests - It helps us to respond to requests that affects students in schools/institutions
2.	Licensure	Name, postal address, phone numbers, email	Public interests - Annual renewal of practice fees gives recognition for eligibility to practice. Legal obligation - The retention of name in the annual register of members. Legitimate interests - It is necessary to process the transactions you initiate and for forwarding of e-bulletin.
3.	Laboratory Accreditation	Email, phone numbers, postal address, biodata of key medical laboratory professional in the laboratory	Legitimate interests - This information is necessary for us to check compliance status on the approved checklist and for

			receiving responses to your inquiries. Public interests - As part of our mandate to accredit medical laboratories
4.	Registration of Medical Laboratories	Name, email, postal address, phone numbers, current licenses of practitioners, CAC registration	Public interests - As part of our mandate to regulate medical laboratories in the country Legitimate interests - This is necessary to remember and for functionality to handle the transactions you initiate towards renewal of your annual retention.
5.	Annual retention of medical laboratories	Name, email, postal address, payment information	Legitimate interest - This information is necessary to update the records and your expectation of receiving a confirmation message. Contract - By renewing your registration for the year, you have entered into a contractual relationship.
6.	Foreign students Registration	Biodata, schools attended, 'O' level results, phone number, email, payment information, postal address	Public interests - As part of our mandate to assess, evaluate and register foreign graduates. Legitimate interests - This is necessary for regular updates of your records on annual licensure and receiving

			confirmatory message, forward e-bulletin.
7.	Examination	Name, sex, marital status, index number, 'O' level results, name of school, date of birth, passport photos, current school results	Public interests - As part of our mandate to train and conduct examinations for scientists, technicians and assistants. Legitimate interests - This information is necessary for regular update of records.
8.	In-vitro Diagnostics	Company name, email postal address, telephone number	Public interests - As part of our mandate to regulate the production, importation and sales of diagnostic laboratory reagents and chemicals. Legitimate interests - This is necessary for us to read and process your requests appropriately.
9.	EQA enrollment	Name of laboratory, postal address, email, telephone, biodata of key laboratory officers	Public interests - As part of our mandate to regulate the practice of medical laboratory science.
10.	Training Institutions seeking MLS/MLT/MLA Accreditation	Name of institutions, biodata of HOD, his email, phone numbers	Public interests - As part of our mandate to regulate the practice of medical laboratory science. Legal interests - For purposes of updating their activities and the headships of the departments on our Register.
11.	Practitioners in Diaspora annual	Name, Email, postal address, date of birth	Public interests - Annual renewal of

	retention		<p>practice fees gives recognition for eligibility as a medical laboratory scientist.</p> <p>Legal obligation - The retention of name in the annual register of members.</p> <p>Legitimate interest - This information is necessary to update the records on annual licensure, your expectation of receiving a confirmation message and forwarding of the e-bulletin.</p>
12.	Website functionality	Website activity collected through cookies	Legitimate interests - It is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, before you have fully completed the process.
13.	Integration and Configuration of Practitioners Data	Name, postal address, phone numbers, email. Name of school/institution, biodata	Consent: It is necessary for the performance of a contract to which the data subject is party.
14.	Employees, Job Applicants	Biodata, Bank Details, Next of kin, NIN, BVN, Marital status, Gender, Pension Information, medical records, ethnicity, religion	Legitimate interests: This information is necessary for regular updates of your records.

Other information that may be needed from time to time to process a request may also be collected as indicated on the website.

3. HOW THE DATA COLLECTED IS USED

The information we collect is primarily used for the purpose and basis on which that data was collected and as set out in the table above. All reasonable precautions are taken to prevent unauthorized access to this information.

4. HOW THE DATA COLLECTED IS PROTECTED

We store and process your personal information on our computers in Nigeria. Where we need to transfer your data to another country, such country must have an adequate data protection law. We will seek your consent where we need to send your data to a country without an adequate data protection law.

We will protect your information using physical, technical and administrative security measures to reduce the risk of loss, misuse, unauthorized access, disclosure and alteration,

Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers and information access authorization controls.

5. ACCOUNTABILITY - WHEN WE SHARE YOUR DATA

We will only pass your data to third parties in the following circumstances:

- i. You have provided your explicit consent for us to pass data to a named third party;
- ii. We are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors;
- iii. We are required by law to share your data.

In addition, we will pass data to third parties outside of Nigeria where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation and Part VIII of the Nigerian Data Protection Act.

6. STORAGE LIMITATION

We are committed to ensuring that your personal data is only retained for the following retention period:

- a. As long as necessary to fulfill the purpose for which it was collected.
- b. For the duration of the contract and a reasonable period afterwards.
- c. To comply with legal and statutory obligations according to the period required by applicable laws and regulations.

- d. As long as your consent is valid, we will seek renewal of consent at least every three years. You have the right to withdrawal your consent at any time.

7. DATA MINIMISATION

We take the principles of data minimization and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

8. RIGHTS YOU HAVE OVER THE DATA YOU PROVIDED

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it easy as possible for you to do this.
- You have the right to ask for rectification and/or deletion of your information you have the right of access to your information.
- You have the right to lodge a complaint with the Nigerian Data Protection Commission if you feel your rights have been infringed.

Detailed information on your rights can be found in Part VI of the Nigeria Data Protection Act.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

9. COOKIES AND USAGE TRACKING

Your internet browser has the in-built facility for storing small files - 'cookies' that hold information which allows a website to recognize your account, remember your preferences and count the number of people looking at a website. Our website takes advantage of this facility to enhance your experience. You have the ability to prevent your computer from accepting cookies but if you do, certain functionality on the website may be impaired.

10. MODIFICATIONS

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.